

16 March 2020

**B&Q Chiswick, 2 Larch Drive**

in the London Borough of Hounslow

planning application no. P/2019/3954

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**The proposal**

Demolition of the existing warehouse and redevelopment of the site to provide 258 residential units (Class C3); 33,054sqm Technology Showcase (Sui Generis); 11,788sqm or flexible retail floorspace (Class A1/A3); 1686 sqm of leisure (Class D2); 219 bedroom hotel (Class C1) in 5 buildings ranging in height from 10 to 16 storeys with associated basement parking, amenity space, public realm works and landscaping.

**The applicant**

The applicant is **Reef Estates** and the architect is **Benoy**.

**Strategic issues**

**Principle of development:** The mixed use redevelopment of the site, providing a Technology Showcase, new homes, hotel, retail and leisure uses within an emerging Opportunity Area is supported in principle, subject to verification that the creation of this out-of-centre 'destination development' would not undermine existing town centres (paragraphs 21-35).

**Affordable housing:** 47% affordable housing (Build to Rent) by habitable room (100% DMR). Further discussion on the affordability of rents across the DMR tenure is required. The proposed covenant length is not acceptable and should be revised to align part B of Policy H11. Further clarity on compliance with part B of H11 is also required. (paragraphs 36-45).

**Urban design and Heritage:** The development layout is broadly supported, however, the articulation of massing requires refinement in some areas and the overall height exceeds that envisaged within existing and emerging the local policy framework. Further urban design work and justification is required to address these issues. The proposal would result in less than substantial harm to the Strand on the Green Conservation Area and Grade II and II\* Listed buildings, at 64-71 Strand on the Green, the Gunnersbury Park Conservation Area, the Kew World Heritage Site, Registered Park and Garden and Conservation Area and the Grade I Listed Orangery as an asset in its own right. Further information regarding the impact on Kew Green Conservation Area is required in order to assess the proposal. Only once the full extent of harm is established can it be weighed against the public benefits of the development (paragraphs 48-91).

**Sustainable development:** Further information on energy efficiency savings, the proposed centralised heat pump system and PV provision is required. The applicant is required to provide water efficiency information on the non-residential components of the development. (paragraphs 95-102)

**Transport:** Further work is required with regard to highway alterations to the TLRN, existing and proposed trip generation assessments and transport modelling (paragraphs 103-126).

**Recommendation**

That Hounslow Council be advised that while the scheme is generally acceptable in principle, the application does not fully comply with the London Plan, for the reasons set out in paragraph 130 of this report.

## Context

1 On 28 November 2019 the Mayor of London received documents from Hounslow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- 1A.1 *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B.1(c) *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C.1(c) *“Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London.”*

3 Once Hounslow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

6 The site is located on a broadly triangular plot of land bound by Great West Road (A4) and the elevated M4 motorway to the west, rail lines and Gunnersbury Park Cemetery to the north, Gunnersbury Avenue (A406) to the east and Larch Drive to the south. The site is occupied by the B&Q big box retail unit and surface level car parking associated with the B&Q site. The site was previously home to the Hudson Motor Company, with purpose built premises for the company established in 1926.

7 The nearest National Rail station is Kew Bridge which is located approximately 550m southwest of the site on Kew Bridge Road. Gunnersbury Underground / Overground Station is located 600m east of the site and served by London Underground District line and London Overground services to Stratford and Richmond. The site is well served by local bus services and there are 6 routes within an acceptable walk distance.

8 Given the above, site has a public transport access level (PTAL) range of 3 to 4, on a scale of 0 to 6b where 6b is the most accessible.

9 Cycleway 9 is currently under construction south of Chiswick Roundabout and will run along Kew Bridge Road and Wellesley Road between Kensington Olympia and Brentford town centre.

10 The immediate site context is varied. Towards the north the site opens out onto the Gunnersbury Park Cemetery on the opposite side of the network rail line from Brentford to South Acton. To the south and west, the elevated M4 motorway dictates much of the urban form. Power Road Industrial Estate (designated as a Locally Significant Industrial Site (LSIS)) is on the opposite side of Gunnersbury Avenue, to the east, which includes car dealerships, offices and other light industrial uses. To the west is a petrol filling station and offices with car dealerships and Brentford Fountain Leisure Centre beyond them. The area beyond Chiswick roundabout to the south and southeast, is characterised by low rise residential properties.

11 There are conservation areas to the north, south and east of the site. To the north, Gunnersbury Park is a Grade II\* Registered Park and Garden and contains the Grade II\* listed mansions and lake with 18<sup>th</sup> Century Grade II\* Listed temple. The park also includes several listed walls, archways, gates, a conservatory, stables and monuments including Gunnersbury Cemetery. The park and surrounding residential dwellings form the Gunnersbury Park Conservation Area. To the south Kew Bridge Conservation Area contains the Grade II Listed Kew Bridge, Kew Bridge Station and several other listed buildings including a Grade I Listed Pumping Station and its listed ancillary buildings. To the east and south-east are the Strand on the Green, Thorney Hedge and Wellesley Road conservation areas. These include the Grade II\* listed Zoffany House as well as many other Grade II Listed buildings. The Kew Gardens World Heritage Site (which contains several listed buildings including the Grade I Listed Orangery and Grade I Listed Kew Palace) and Kew Green Conservation Area (which includes several Grade II Listed Buildings and forms part of the buffer zone of the World Heritage Site) are located to the south of the site beyond the River Thames.

12 The site is not allocated for development within the adopted Hounslow Local Plan however it is identified for residential development in the draft Great West Corridor Local Plan Review. The site is located within the Great West Corridor Opportunity Area as set out in the Intend to Publish London Plan.

## **Details of the proposal**

13 The proposals would see the demolition of existing buildings and redevelopment of the site to provide a mixed-use development comprising of a 33,054 sq.m Technology Showcase, 258 residential units, a 219 bedroom hotel, 11,788 sq.m of retail floorspace and 1,686 sq.m of conferencing facilities in 5 buildings ranging in height from 10 to 16 storeys with associated basement parking, amenity space, landscaping and public realm works.

14 The development is arranged around a central public square. The Technology Showcase is a linear part 8 (49.7m AOD), part 9 (54.1m AOD) and part 10 (58.5m AOD) storey building positioned on the southwestern edge of the site fronting onto the elevated M4 motorway. 12 (57.7m AOD), 13 (60.9m AOD) and 16 (70.5m AOD) storey residential blocks are located to the north and west of the site, a 14 storey (67.3m AOD) hotel block positioned to the east of the site. The residential and hotel blocks are set above a three storey podium providing the exhibition space, retail and conferencing spaces which are accessed via galleries facing into the public square.

15 The Technology Showcase would comprise a flexible mix of showrooms and spaces for exhibitions, events and conferencing. The use will primarily exhibit a range of technology-focussed transport and mobility products and brands. The building would be arranged with a large flexible exhibition space across ground floor facing onto the public square, with tenant showcase/units space on the floors above. The top floors of the building could provide further exhibition space together with conferencing and event space.

## Planning history

16 A series of pre-planning application meetings have been held between the applicant, Hounslow Council and the Greater London Authority on the above proposal at the above site. An initial meeting was held with the GLA on 5 July 2017, with a follow up meeting held on 2 October 2018 a further follow up meeting was held on 18 April 2019. GLA officers advised that the principle of a high density mixed use development is supported but further consideration should be given to the matters of affordable housing, urban design, the proposed land uses and transport.

17 There is a new emerging local context as a result of a number of developments progressing in the vicinity these include:

- Land at Chiswick Roundabout, known as the Citadel Scheme (GLA ref: 0075f) – Planning permission was granted in April 2010 for a 52 metre high office building immediately to the south of the site. This permission has been implemented. Land at Chiswick Roundabout, known as the Chiswick Curve (GLA Ref: 0075i Appeal ref: 00505/EY/P18)– Permission was refused in 2017 for a mixed-use development of land adjacent Chiswick Roundabout, with a part 25-storey (98.57m AOD) and part 32storey (120.29m AOD) building, providing 327 dwellings, office, retail/ restaurant uses, parking, landscaping and advertisement consent. The refusal of the development was the subject of a public inquiry in 2018, with the decision recovered by the SoS who disagreed with the inspector that permission should be granted, and on 19 July 2019 determined that planning permission should be refused. The SoS’s decision was challenged by planning statutory review and on 10 March 2020 this challenge was dismissed.
- Land at Lionel Road South (GLA ref: 3111a) - Brentford Community Stadium and associated residential development up to 16 storeys located to the south west of the site beyond the elevated M4 motorway and currently under construction. A section 73 application seeking amendments to the parameters of the Outline Permission in relation to the Duffy Site (GLA ref: 3111e) is currently under consideration.

- 1-4 Capital Interchange Way (GLA ref: 3814a) – a mixed use residential-led development up to 16 storeys. Hounslow Council resolved to grant permission. The Mayor issued a Stage 2 on 27 January 202 which set out that the Mayor is content for Hounslow Council to determine the application itself.
- Citroen Garage Site, Capital Interchange Way (GLA ref: 4279) – a residential-led development up to 18 storeys. The Secretary of State called in the planning application following the Mayor’s resolution to grant permission for this scheme on the 22nd of August 2018. The application was heard at a public inquiry which closed on 6 March 2020.

## Strategic planning issues and relevant policies and guidance

18 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hounslow Local Plan 2015 and the 2016 London Plan (Consolidated with Alterations since 2011).

19 The following are relevant material considerations:

- National Planning Policy Framework (2019) and National Planning Practice Guidance.
- London Plan – Intend to Publish version (December 2019)
- Hounslow’s Great West Corridor Local Plan review (Regulation 19 Consultation, July 2019);
- Draft Brentford East SPD (October 2017)
- Royal Botanic Gardens Kew World Heritage Site Management Plan 2014
- Draft Royal Botanic Gardens Kew World Heritage Site Management Plan 2019-2025

20 The relevant strategic issues and corresponding policies are as follows:

- Land use principles *London Plan;*
- Visitor Infrastructure *London Plan*
- Housing/affordable housing *London Plan; Affordable Housing and Viability SPG;*
- Employment *London Plan;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.*
- Heritage *London Plan; Shaping Neighbourhoods: Character and Context SPG; World Heritage Sites SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG.*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*
- Transport *London Plan; the Mayor’s Transport Strategy; Land for Industry and Transport SPG.*

## Principle of development

21 The site is not allocated for particular development in the current Hounslow Local Plan, however it does have an allocation for an employment-led mixed use development, comprising but not limited to Leisure (D2), Hotel (C1), Office (B1a) Residential (C3) and Retail (A1), in the emerging Great West Corridor Local Plan. Furthermore, the site is located within the emerging Great West Corridor Opportunity Area as identified in the Intend to Publish London Plan - recognising the strategic potential for growth and intensification of employment and housing. Policy SD1 of the Intend to Publish London Plan sets an indicative capacity of at least 7,500 additional homes and 14,000 new jobs within the Opportunity Area. In addition, both the London Plan and intend to publish London Plan identify the Great West Corridor as a Strategic Outer London Development Centre (SOLDC) for media and Policy 2.16 seeks to bring forward adequate development capacity to create a distinct and attractive business offer, including mixed-use development and public realm.

### Car/technology showcase

22 The development comprises a 33,054 sq.m. car/technology showcase which would comprise a mix of showcase/showrooms spaces, exhibition space, events space and conferencing space. The showcase element would in one sense be similar to flagship car showrooms that currently line the A4 and the elevated section of the M4, but would be specifically designed to showcase a range of technology-focussed transport and mobility brands and products, alongside traditional car manufacturers. In addition to the showcase/showroom element, the use would also provide integrated exhibition, conferencing and event spaces and would be complimented by the wider retail offer of the site.

23 In line with the emerging site allocation and the Great West Corridor Masterplan, the Technology Showcase would provide a visible commercial frontage along the Great West Road and form a 'buffer' - sheltering the sensitive non-commercial uses on the site from the adverse environmental impacts of the major roads to the south.

24 Policies SD1 and E8 of the Intend to Publish London Plan supports development which creates employment opportunities and growth across a diverse range of sectors and supports innovation and collaboration between businesses. The proposals would support innovation within the transport and mobility industry, enabling engagement between businesses and other relevant research and innovation organisations, and would support growth in the wider opportunity area. GLA officers further recognise the potential for growth in the emerging Great West Corridor and the role the technology showcase could play; not only in terms of local employment generation, but also unlocking the potential for the site to accommodate more sensitive uses (such as residential). Furthermore, the extensive public realm improvement proposals and the potential of the site to become a visitor destination, could facilitate the delivery of various spin off economic benefits for the local economy - supporting wider regeneration objectives for the area.

25 Accordingly, having regard for the above mentioned policy context, the proposed technology showcase is supported in principle, subject to the resolution of further strategic planning issues considered in this report.

## Visitor Infrastructure

26 London Plan Policy 4.5 'London's Visitor Infrastructure' seeks to achieve a target of 40,000 net additional hotel rooms by 2036, and where located beyond the Central Activities Zone, should be located in town centres and Opportunity Areas with good public transport access. Policy E10 of the Intend to Publish London Plan also supports such accommodation, and paragraph 6.10.2 identifies that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041.

27 The site is located within the emerging Great West Corridor Opportunity Area and benefits from good public transport accessibility. Furthermore, the emerging site allocation identifies the site as suitable for a large hotel. As such, this is an appropriate location for visitor accommodation. The additional rooms would make a positive contribution towards the requirements of London Plan Policy 4.5 and Policy E10 of the Intend to Publish London Plan, and on this basis the proposal to provide hotel accommodation as part of the redevelopment of the site is supported in strategic planning terms.

## Retail and town-centre uses in an out-of-centre location

28 The proposals would see the provision of 11,788sqm of retail floorspace at ground, first and second floor levels wrapping around the central public square (equivalent to an uplift of 4,078 sq.m.). The application site is not located within a town centre and is approximately 1 kilometre to the west of the Chiswick Town Centre and 1.7km to the east of Brentford Town Centre. The site is as such considered to be in an out-of-centre location.

29 Both London Plan Policy 2.15 and Policies SD6, SD7 and SD8 of the Intend to Publish London Plan adopt a town-centre first approach, which recognises that town centres should be the foci for commercial development beyond the CAZ. Policies SD7, SD8 and E9 of the Intend to Publish London Plan seek to realise the potential of out-of-town retail parks to deliver housing intensification and to provide a diverse mix of uses and discourage out-of-centre development of main town centre uses. London Plan Policy 4.7 and Policies SD7 and E9 of the Intend to Publish London Plan provide guidance on retail uses specifically, stating that mixed use intensification of out-of-centre retail sites should not result in a net increase in retail or leisure floorspace unless the proposal is in accordance with the Local Plan, or can be justified through the sequential test and impact assessment requirements.

	<b>Existing (GIA)</b>	<b>Proposed (GIA)</b>	<b>Difference</b>
<b>Retail (A1)</b>	7,710 sq.m	11,788 sq.m	+4,078 sq.m
<b>Technology Showcase (Sui Generis)</b>	-	33,054 sq.m	+33,054 sq.m
<b>Leisure (D2)</b>	-	1,686 sq.m	+1,686 sq.m
<b>Hotel (C1)</b>	-	9,262 sq.m	+9,262 sq.m
<b>Total</b>	<b>7,710 sq.m</b>	<b>55,790 sq.m</b>	<b>+48,080 sq.m</b>

Table 1: Existing and proposed non-residential land uses

30 Table 1 sets out the existing and proposed non-residential uses on the site. The proposed development would provide an additional 4,078 sq.m of retail floorspace when compared with the existing site and a further 10,948 sq.m of leisure and hotel, which are considered to be town centre uses. Further to this, the 33,054 sq.m. Technology Showcase (intended to form the central ‘anchor’ of this new commercial destination) would significantly contribute to the attraction of visitors and consumers to the site. Fundamentally, GLA officers seek to ensure that the potential emergence of this site as a new out-of-centre destination is sustainable in strategic transport terms, and would not risk undermining the success and vitality of existing town centres in the vicinity.

31 The application is supported by a retail impact assessment (RIA) which states that, owing in part to the heritage and access constraints within Chiswick Town Centre, the bespoke nature of the proposal and scale of the required town centre or edge of centre development site, there are no sequentially preferable alternative locations which can accommodate the proposals. The RIA also seeks to consider the impact of the proposals on the viability and investment in existing nearby town centres. The retail offer is envisaged to predominantly comprise high end comparison retail with a small proportion of convenience retail intended to support the ‘day to day’ retail needs likely to be generated by the development.

32 The envisaged convenience retail offer is purported to respond to a qualitative and quantitative need for essential everyday local shopping, café/restaurants and local services arising from the development in accordance with Hounslow Local Plan Policy TC1 and the RIA concludes that this would be unlikely to have a material adverse impact on any nearby town centre. The proposed development is likely to draw some comparison goods trade from local town centres within Hounslow, specifically Chiswick as the nearest centre with a significant comparison offer. However, the RIA identifies that as Brentford town centre has a negligible comparison offer and Chiswick town centre currently achieves good levels of vitality and viability owing to low vacancy, the quality of the current comparison retail and food and beverage offer, and the high quality environment, the impact of the development on these town centres would be imperceptible.

33 GLA officers note the findings of the RIA and recognise the benefits of the retail offer in providing local amenity for new residents and hotel visitors, as well as the role this would play in terms of animating the proposed public realm and

supporting the function of the technology showcase and associated conferencing facilities.

34 However, whilst it is noted that the existing retail use of the site is unrestricted, the proposals would result in a significant uplift in retail floorspace on the site. and although the findings of the RIA are noted, these impacts are based on the assumptions of the type of retail offer to be delivered. Furthermore, given the strong policy presumption for a reduction in retail floorspace at this out-of-centre location (notably within the emerging site allocation - given the concerns regarding highways impacts and limited detail on measures to improve access by sustainable transport modes); and, in view of the potential impact of the Technology Showcase as an additional attractor to this site, GLA officers seek further discussions with Hounslow Council and the applicant team to verify that proposed emergence of this site as a new out-of-centre ‘destination’ is sustainable in strategic transport terms, and would not risk undermining the success and vitality of existing town centres in the vicinity.

### Housing

35 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London and sets a target for the Council to deliver a minimum of 8,222 homes in the Plan period 2015-2025. The Intend to Publish London Plan increases this ten-year target to 17,820. Specifically, for the Great West Corridor, the Council has set a housing target of at least 7,500 new homes over the plan period, which is reflective of the London Plan Intend to Publish indicative capacity for the OA. As noted above, policies SD8 and E9 of the Intend to Publish London Plan seek to realise the potential of out-of-town retail parks to deliver housing intensification and to provide a diverse mix of uses. The development would provide 258 new homes, making a contribution to the Council’s housing target, and is strongly supported.

### **Housing**

36 The proposed unit mix is as follows:

Tenure	No of homes	Unit type				% tenure by habitable rooms	% tenure housing by unit
		Studio	1 Bed	2 bed	3 Bed		
<b>Market</b>	154	34	62	58	0	53%	60%
<b>DMR</b>	104	0	39	39	26	47%	40%
<b>Total</b>	<b>258</b>	<b>34</b>	<b>101</b>	<b>97</b>	<b>26</b>	<b>100%</b>	<b>100%</b>

Table 2: Affordable Housing Provision

37 The applicant intends to provide all residential units as Build to Rent (BtR) accommodation. Policy H11 of the Intend to Publish London Plan and the Housing SPG acknowledges the support of the provision of more private rented homes in the build to rent (BtR) sector (Policy 3.8B a1) and the London Plan recognises that the planning system should take a positive approach to enabling this sector to contribute to the achievement of housing targets.

38 London Plan Policies 3.11 and 3.12 and Policy H5 of the Intend to Publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%.

39 In line with Policy H11 of the Intend to Publish London Plan the applicable affordable housing threshold to follow for the Fast Track Route would be 35% (by habitable room), as the site is not in industrial use or in public ownership. Applications providing the threshold level of affordable housing, with an appropriate tenure split and meeting all relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, as well as investigating grant funding, can follow the 'Fast Track Route' set out in Policy H5 of the Intend to Publish London Plan. This means that they are not required to submit a viability assessment or be subject to a late stage viability review

40 The development will deliver 47% affordable housing by habitable room as set out in table 2 above. Policy H11 of the Intend to Publish London Plan supports the provision of Discount Market Rent (DMR) as the sole affordable housing product within BtR development provided the housing is delivered at genuinely affordable rents and where the development meets the criteria set out in part B of the Policy. In order to qualify for Fast Track, under the Build to Rent pathway, at least 30% of DMR homes must be provided at an equivalent rent to London Living Rent with the remaining 70% at a range of genuinely affordable rents under 80% of market rent and affordable to those with an annual income of less than £60,000.

41 In respect of the affordability of the DMR units, it is proposed that discounted rents are fixed at London Affordable Rent (LAR) levels (30% of units), 65% (35% of units) and 80% (35% of units) of market rents to meet a range of income levels. Rents will be capped at 40% of net household income in the London Plan Monitoring report, which currently equates to £1,595 per calendar month.

42 In line with paragraph 4.11.10, DMR is an intermediate product and is managed and allocated as such. It is therefore not appropriate to seek DMR at or close to social rent levels. Accordingly the proposed provision of 30% DMR at LAR levels is not supported. Whilst the provision of a low-cost rent tenure within the scheme could be welcomed in principle, this would need to be managed by a registered provider to support the Council in housing residents from its housing waiting list.

43 Further to the above, GLA officers do not support the higher end of the rent levels which are currently set at 80% of market rent. Further discussion on the affordability of rents is required before the proposed offer can be considered acceptable and Fast Track compliant. The applicant is reminded that the Mayor's strong preference is for DMR homes to be let at London Living Rent levels.

44 Fast Track compliance is further subject to the development meeting the requirements of part B of Policy H11. It is noted that the applicant intends to covenant with the council to hold the new homes as build to rent for a period of 10 years. In line with Policy H11 of the Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG, the minimum covenant length should be 15 years commencing from the date of occupation of the relevant block, or the date on which the entire block is available for occupation, whichever is the later. The proposed 10 year covenant length is not acceptable and should be revised to align with the policy requirement. Further details of a clawback mechanism to ensure there is no financial incentive to break the covenant and the clawback calculation methodology should also be provided. The clawback amount must demonstrate a sufficient difference in the value

of units between rented and for sale tenures, consistent with the 'distinct economics of build to rent, for the scheme to qualify for Fast Track under the Build to Rent pathway. The applicant should also provide confirmation on compliance with the criteria in part B of Policy 11 specifically in relation to the availability of longer tenancies, rent and service charge certainty, on-site management, upfront fees and eligible to households on incomes up to £60,000. These matters should be secured by condition or planning obligation as appropriate.

45 Given the above concerns, the proposed affordable housing provision does not currently qualify for consideration under the Fast Track Route. Further discussion on this matter is therefore required in order to address the above concerns.

### Residential mix

36 London Plan Policy 3.8 encourages new developments to offer a range of housing choices in terms of mix and size. Policy H10 of the Intend to Publish London Plan recognises that a higher proportion of one and two-bedroom units is generally more appropriate in more central or urban locations, it also states that guidance on the size of low cost rented homes should be based on evidence on need. The development proposes that 10% will be family sized units (3+ bedrooms), which rises to 25% within the affordable tenure. In strategic planning terms the mix (outlined above) is acceptable, and, GLA officers note the provision of family housing has been appropriately prioritised within the affordable component of the mix.

### Children's play space

46 London Plan Policy 3.6 and Policy S4 of the Intend to Publish London Plan require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Mayor's Play and Recreation SPG and Policy S4 of the Intend to Publish London Plan expects a minimum of 10 sq.m. per child to be provided in new developments. The applicant has calculated a play space provision requirement of 1,110 sq.m. The development provides a total of 340 sq.m of children's play space within the residential podium together with 64 sq.m. provided within an internal 'play room' at podium level. The applicant should clarify the planning status of the proposed 'play room' and whether this would be secured solely to provide freely accessible play provision to all residents in perpetuity. There is some concern with the proposed provision of doorstep play within the public square at ground floor level. The public square is envisioned to be a highly trafficked public space in a commercial setting, with retail and exhibition spaces spilling out onto the square and retail galleries surrounding the space at first and second floor level. The square lacks direct overlooking from the residential element of the development and access to the square from the residential cores is unclear. Given the above, the appropriateness of providing the 0-5 play space within the central square is questioned. The applicant should explore options to deliver 0-5 play spaces at podium level.

47 In accordance with Policy S4 of the Intend to Publish London Plan, it must be demonstrated that play space and equipment within the development is not segregated by tenure. The total play space provision and a mechanism to secure open access across tenures should be agreed with Hounslow Council and secured by an appropriate planning condition/obligation.

## Urban design

48 Good design is central to all objectives of the London Plan, the objective to create a city of diverse, strong, secure and accessible neighbourhoods, to which Londoners feel attached whatever their origin, background, age or status. These objectives are mirrored in the Intend to Publish London Plan, with the concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable. Policies contained within chapter seven of the London Plan, and chapter 3 of the Intend to Publish London Plan, specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods. It sets out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this. It should be noted that Policy D12 of the Intend to Publish London Plan introduces measures relating to fire safety that must be addressed via the planning process.

### Site Layout

49 The scheme has evolved positively through pre-application advice and the design team have worked to address the key issues raised, including a clear approach to defining key pedestrian and cycle routes and demonstrating how they will connect with the surrounding existing and future routes.

50 The outward facing edges of the site are now better-defined with pedestrian footways and delineated cycle paths – further clarity is needed to ensure there are no instances of conflict between vehicles, cyclists and pedestrians, along the full perimeter of the site, particularly along the eastern edge where the footway appears to be replaced with a linear zone of tree planting.

51 The inclusion of an opening in the Technology Showcase building to allow for a future connection into the site from the M4 edge is welcomed (in line with the Council's SPD masterplan). Further detail on how this could link into a new crossing new pedestrian crossing across the A4 Great West Road (beneath the M4) is sought in line with comments set out in the transport section below. If feasible, the delivery of this would significantly improve the site's connectivity to the west.

52 In response to pre-application stage advice, blocks are now orientated to create sightlines into the public square and to align with future pedestrian crossings on the approach from Power Road and the Citadel development. This is welcomed.

### Tall Buildings

53 London Plan policy 7.7 and Policy D9 of the Intend to Publish London Plan set out the criteria against which tall and large buildings should be assessed and establish support for the development of tall buildings where they create attractive landmarks enhancing London's character, and help to provide a catalyst for regeneration, where they are acceptable in terms of design and impact on their surroundings. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate form of development in development plans and criteria against which impact should be assessed.

54 Hounslow Local Plan policy CC3 broadly identifies the Golden Mile as an appropriate location for tall buildings with specific sites to be identified within the Great West Corridor Plan and that tall buildings in this location should be carefully placed to avoid the creation of a wall of development or result in significant adverse impact on the setting of, or views from, heritage assets including Gunnersbury Park, Royal Botanic Gardens Kew World Heritage Site, Syon Park and Osterley Park. The Great West Corridor Local Plan review identifies the site as part of the Brentford Stadium Cluster (East) where tall buildings are considered appropriate.

55 The Great West Corridor Masterplan and Capacity Study (July 2019), which informs the Local Plan review, identifies the east part of the site within the Brentford Stadium Tall Building Cluster and provides an indicative range of heights from 48m to 61m AOD.

56 The site is also located within the emerging Great West Corridor Opportunity Area. Opportunity Areas are defined in the London Plan and Intend to Publish London Plan as 'London's principle opportunities for accommodating large scale development to provide substantial numbers of new employment and housing', as such the Opportunity Area designation anticipates a degree of change and urban intensification.

57 Whilst, in design terms, the heights of the proposal are considered to be proportionate to both the existing setting (adjacent to the M4) and emerging context as outlined in paragraph 16 and noting the site's Opportunity Area designation, in this case the tallest elements of the development are located outside the Brentford East tall buildings cluster and would exceed the identified height range - with the hotel block proposed at 67m AOD and residential block C proposed at 70m AOD. As such, it must be demonstrated that the scale proposed would not result in unacceptable impacts on local views and heritage assets, and that the development accords with the other tall building assessment criteria within the London Plan and Intend to Publish London Plan (refer below).

### *Visual impacts*

58 Notwithstanding the assessment of heritage impact considered later in this report, the architecture and form of the development generally creates distinct stepping volumes in longer range views which contribute to the existing and emerging skyline of the Great West Corridor Opportunity Area. Where visible in mid-range and local views the development would replace the existing low rise retail shed with new buildings, proportionate in scale to emerging development in the area, which would contribute positively to the townscape, particularly in views where the development fronts onto the highly urbanised M4/A4 and the North Circular Roads, introducing active frontages along the edges of the site with views into the central public space. The development would substantially change the setting of parts of Gunnersbury Cemetery to the south, however this would be viewed in the context of tall buildings in the wider area which are an established part of the setting.

59 Criteria C(1) (d) and (e) of Policy D9 further specify that buildings should avoid harm to heritage assets and their settings, provide clear justification where harm occurs, demonstrate alternatives have been explored and demonstrate clear public benefits that outweigh harm; and buildings in the setting of a World Heritage Site

must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it. These criteria must be read in the context of paragraph 194 and 195 of the NPPF. A full assessment of the impact of the proposals on heritage assets, including the Kew World Heritage Site is considered in the heritage section below.

60 The supporting Environment Statement (ES) identifies that, owing to the orientation of the building and the glazed façades of the Technology Showcase, the development may have adverse reflected glare effects on road-users at surrounding junctions and along the M4 flyover. The ES also demonstrates some adverse impact on nearby properties by way of light overspill from external and internal lighting. The Council (in consultation with Highways England, as appropriate) should be satisfied that sufficient steps have been taken to acceptably mitigate such impacts in order to prioritise the safety of road-users as well as the local amenity of residents.

#### *Functional impacts*

61 As set out in the transport section of this report, the applicant must demonstrate through the submission of highway modelling and trip generation assessments across all modes, that the capacity of the area is capable of accommodating the quantum of development in terms of access to facilities, services and sustainable modes of transport.

62 It should further be demonstrated that the building has been designed to mitigate any potential overcrowding associated with the proposed uses.

#### *Environmental impacts*

63 The supporting ES identifies that the proposed development is not expected to result in significant adverse daylight, sunlight, overshadowing or wind impacts to neighbouring buildings or open areas within and surrounding the development, across the year subject to recommended mitigation measures with regard to wind impacts. The borough must be satisfied that the cumulative impact of approved development nearby would not result in significant adverse environmental impacts.

64 The supporting ES further identifies that the proposed development is unlikely to adversely impact on street level air quality conditions or the comfort and enjoyment of open spaces around the buildings due to noise, subject to mitigation with regard to plant attenuation and controls on servicing times.

#### *Public Access*

65 Given the nature of the proposed uses on site (Technology Showcase/retail), in addition to the public square at ground floor level, free to enter publicly accessible spaces are provided throughout the development site.

#### *Conclusion*

66 The height of the proposed development is outside of the indicative parameters as set out in Hounslow's emerging development plan. Further

assessment is required, in respect of the impacts identified above, to determine if the proposed height of the development is appropriate for the proposed location.

### Form, massing and architecture

67 The Technology Showcase building would be visually distinctive with an expressive textured glazed façade and a series of assorted framed displays overlooking the elevated M4, interspersed with vertical green wall elements. The public square facing façade is a more ordered glazed elevation with exposed steel frame and bracing which ties in with the buildings industrial-inspired expression. This distinctive design would reinforce sense of place at Brentford East and enhance the visual interest of the site within the evolving context of the wider area.

68 The form and expression of the residential and hotel buildings contrasts with the more industrial architectural language of the Technology Showcase. The residential buildings use a mix of brick tones and staggered solid and glazed elements to the facade to break down the mass of the blocks. However, given the broad massing and lack of visible sky between blocks, in some views the scheme appears as a wall of development (e.g. from Gunnersbury Cemetery). Despite contrasting material tones, the architectural treatment does not successfully break down this mass. Furthermore, the staggered solid and glazed elements of the residential facades gives the building elevations a disordered appearance. The applicant should consider alternative massing options that reduce the breadth of the building footprints and increase sky visibility between the blocks. The applicant should also consider a more ordered approach to the façade design. The use of reveals and decorative brickwork elements are considered to be positive elements to the facade and could be further employed to add depth and variety to the elevations without the use of solid panels. A more subtle variation in the brick tone between the residential blocks may further assist in reducing the visual impact of the proposal.

69 The hotel block presents a prominent grid with vertical emphasis, detailed brickwork and metal panelling which provides architectural variation and complements the site and surrounding context.

### Residential Quality

70 The western residential block is likely to feel removed from the street as a result of the substantial distance between street level lobby and core to this block. The applicant should provide a separate lobby entrance off the main square to create improved access for residents.

71 The northern and western blocks contain 10 units per floor, resulting in broad floorplates and relatively bulky building forms. As the cores are positioned in the centre of the plan, avoiding long corridors the core to unit ratio is acceptable. The applicant is however encouraged to explore means of introducing natural daylight and ventilation to the corridor spaces.

72 There are a number of single aspect units that would fall within the Housing SPG's 45 degree of north rule. While they would however benefit from views over the open space to the north, the kitchen areas appear deep set in the unit layouts and ADF testing should ensure that all kitchen/living spaces will receive acceptable levels

of daylight. Floor to ceiling heights and sizing of window openings should be maximised as part of this work.

### Agent of change

73 In line with Policy D13 of the Intend to Publish London Plan, the proposed development should include measures which mitigate against any air quality, noise and/or vibration emanating from nearby sources, including the road network and adjoining railway line.

### Fire Statement

74 In line with Policy D12 of the Intend to Publish London Plan, development proposals must achieve the highest standards of fire safety and ensure that they: are designed to incorporate appropriate features which reduce the risk to life in the event of a fire; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape for all building users; adopt a robust strategy for evacuation which all building users can have confidence in and provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

75 The applicant is as such required to submit a Fire Statement by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of: the building's construction; the means of escape; access for fire service personnel and equipment, and the ongoing maintenance and monitoring of these and how provision will be made within the site to enable fire appliances to gain access to the building. The Fire Statement should be submitted prior to determination and suitably secured by condition.

## **Heritage**

76 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

77 The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Any harm to a heritage asset should be given substantial importance and weight in any planning balance. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

78 London Plan Policy 7.8, states that development affecting heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Policy HC1 of the Intend to Publish London Plan further specifies that the cumulative impacts from incremental change from development on heritage assets and their setting should be actively managed and that development proposals should avoid harm.

79 London Plan Policy 7.10 states that development should not cause adverse impacts on World Heritage Sites or to their settings (including any buffer zones). In particular, it should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. Policy HC2 of the Intend to Publish London Plan further states that development, in WHS and their settings, including buffer zones, should conserve, promote and enhance their Outstanding Universal Value, or the authenticity and integrity of their attributes and provide that when considering planning applications, appropriate weight should be given to the provisions of World Heritage Site Management Plans.

80 The site is not located within a conservation area and there are no listed buildings within the immediate vicinity of the site. The area surrounding the site is in transition with a number of tall buildings granted consent or under consideration. Having regard to both the current and emerging context, the proposed development would be of a scale, relative to the generally low rise townscape of the immediate surrounding buildings, to potentially affect the setting of a number of designated heritage assets in the wider area, as described in paragraph 8.

81 Given the scale and alignment of existing surrounding development, dense tree cover and the location and form of the proposed scheme, the proposed development would be largely hidden from key views from within Thorney Hedge Conservation Area, specifically key views along Chiswick High Road, and from the Wellesley Road Conservation Area. The development is as such considered to not cause harm to the heritage significance of these assets. The Kew Bridge Conservation Area includes a group of Grade I and II listed buildings associated with Kew Pumping Station and the Grade II listed Kew Bridge Station and Kew Bridge itself. The setting of the conservation area and listed buildings is dominated by the busy Kew Bridge Road and surrounding large scale development both existing and emerging. As such the proposed development, which is beyond the prominent elevated section of the M4 would not harm the significance of these heritage assets.

82 Gunnersbury Cemetery lies immediately to the north of the site. The Cemetery adjoins Gunnersbury Park, a Grade II\* listed Registered Park and Garden. The Park and Cemetery are both within the wider boundary of Gunnersbury Park Conservation Area. The development would be clearly visible and prominent in the background of views from within Gunnersbury Cemetery, rising distinctly above the tree line. Given the proximity of the site, the architecture and materiality of the buildings would be clearly perceptible in views from within the Cemetery and would substantially impact upon the setting. The visibility of development over the tree line from within the Cemetery is established with Vantage West in particular and emerging development to the south west. However, given its proximity, the development would significantly impact upon views from within this part of the conservation area and would give rise to some harm to its significance. The supporting HTVIA assesses a number of views from within the wider conservation area and concludes that whilst the proposal would

be visible in long views to the south, this would be in the established context of buildings along the Great West Corridor, and the development would have negligible visibility and negligible impact on more sensitive areas of the Conservation Area (the historic core and the residential estate). GLA officers concur with this assessment. Having regard to the above-mentioned harm, and in particular the localised nature of the harmful views from within the less sensitive cemetery, the development is considered to result in less than substantial harm to the significance of the Gunnersbury Park Conservation Area and no harm to the significance of the Grade II\* Gunnersbury Registered Park and Garden and listed buildings therein.

83 The proposed development would be visible above the roofline of existing low rise buildings in key views of the of the Strand on the Green Conservation Area, from Kew Bridge and from the pedestrian path on the south bank of the River Thames. In views from Kew Bridge, the development would be seen in the context of similarly scaled modern development, and would itself result in limited additional harm. In views from along the river path, the development would be visible above the roofline of the Grade II and II\* Listed buildings, at 64-71 Strand on the Green, which form the historic core of the Conservation Area. In these view, it would be possible to perceive the visual qualities of the development including sloping architectural forms and glazed elements which mitigates the harm to some degree. However, cross-river views are a key aspect of the significance of the Conservation Area and the setting of the listed buildings, and the visibility of the development is considered to disrupt to an extent these views and cause some harm to the significance of the heritage assets. Views towards the Conservation Area and listed buildings is available over a length of the southern towpath, and is experienced kinetically. Thus, the visibility of the proposed development will change in those views (becoming less prominent as the viewer moves west and will be seen in the context of the emerging Stadium cluster. The development will be viewed as part of an emerging strip of tall buildings to be developed as part of the approved Brentford Football Club scheme, 1-4 Capital Interchange Way and the Citadel scheme, the latter of which would conceal the taller hotel block from these views. Rendered views have been provided as part of the supporting THVIA. GLA officers have carefully considered the submitted assessment and consider the development to result in less than substantial harm, at the lower end of the scale, to the significance of the Strand on the Green Conservation Area and the Grade II and II\* Listed buildings, at 64-71 Strand on the Green, as individual heritage assets and as a group.

84 Within the Kew Green Conservation Area, which forms part of the Kew World Heritage Site buffer zone, the development would largely be screened by the buildings and trees that line the edges of the Green and visibility is limited to certain positions on the south side of the Green. Where visible between breaks in the trees the building would appear above the roofline of the perimeter buildings. However, it would sit in the distance below the treeline and not create an intrusive or prominent feature. In views north from the Conservation Area toward the site, across Kew Bridge, the development would be visible above the roofline of smaller scale development. These views would be seen in the context of other closer large scale developments such as Rivers House. Overall, GLA officers consider that insufficient information has been provided to assess the impact on the significance of the Kew Green Conservation Area. The applicant must submit rendered version of view 9, to enable a full assessment of the proposals impact on the Kew Green Conservation Area and Kew World Heritage Site buffer zone.

85 The site is located approximately 1 kilometre to the north-east of the principle northern boundary of the Royal Botanic Gardens Kew World Heritage Site, Registered Park and Garden and Conservation Area (hereafter known as “the Kew Gardens designations”) which contains a number of listed buildings. World Heritage Sites are places of Outstanding Universal Value to the whole of humanity and the effect of the development on the Kew Gardens designations is a key strategic consideration.

86 The proposed development will generally be screened by mature tree cover within the Kew designations and only partially visible in limited locations. The development will have little impact upon the majority of the listed structures and therefore not harm their setting.

87 One of the more sensitive locations in which the development may be seen is in views of the Grade I listed Orangery. In the supporting THVIA, the applicant has provided views from the Great Lawn to the south of the Orangery, the south path of the former palace lawns and the north path of the former palace lawns. In these views, the upper floors of the development can be seen over the roofline of the Orangery to the east, although views of the building would be very limited and largely obscured by tree cover and the degree of visibility would vary as the viewer moves along the path. The Orangery is appreciated as a free standing structure within a garden setting with only the sky above and trees around, the introduction of new elements above the roofline would cause some harm to its significance. However, due to the amount of tree cover and limited extent of visibility, the adverse impact would be less than substantial. The applicant’s THVIA demonstrates that any perception of the development over the roof of the Orangery would be seen in the context of emerging cumulative development including Brentford Football Stadium that would be more visible. GLA officers are of the opinion that given the height and massing of the proposal and the physical separation between the subject site and the WHS, the development would not visually detract from the Orangery and its ability to be read as a distinct element within its setting. It is considered that the proposal would have a slight harm to the setting of the Grade I Listed Orangery both when the proposal is considered individually and when considered cumulatively with other existing and consented development in the area.

88 Given harm has been identified to a key building, the Orangery, within the wider area based heritage asset of the Kew WHS, then the WHS and its Outstanding Universal Value is also judged to be harmed. Accordingly, it is considered that the proposed development would result in less than substantial harm, but at the lower end of the scale, to the Kew Gardens designations, as well as the Grade I Listed Orangery as an asset in its own right.

89 GLA officers have concluded that the proposal would result in less than substantial harm to the Strand on the Green Conservation Area and Grade II and II\* Listed buildings, at 64-71 Strand on the Green, the Gunnersbury Park Conservation Area, the Kew Gardens designations and the Grade I Listed Orangery as an asset in its own right. As discussed in paragraph 84, GLA officers are unable based on the submitted information to reach a conclusion on the impact of the scheme on Kew Green Conservation Area.

90 In accordance with paragraph 196 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets. Given the status of the Royal Botanic Garden Kew as a World Heritage Site, which is considered to be a heritage asset of international importance, the decision maker must give particularly importance and weight to any identified harm to this asset.

91 Following receipt of the additional material sought in paragraph 84, GLA officers will be in a position to assess the cumulative harm to heritage assets. Such harm will then be weighed against the public benefits of the scheme which would need to be secured as part of the planning permission, and which would include the delivery of new homes and affordable homes contributing to the borough's housing delivery targets, substantial improvements in the quality of the existing environment through the redevelopment of the underutilised site, the optimisation of an accessible brownfield site within an emerging Opportunity Area, economic benefits including the creation of jobs and improved public realm, including a new public square.

## **Inclusive access**

92 London Plan Policy 7.2 and Policy D3 of the Intend to Publish London Plan require that all new development achieves the highest standard of accessible and inclusive design. These policies seek to ensure that all new development can be used easily and with dignity by all.

93 London Plan Policy 3.8 and D5 of the Intend to Publish London Plan require that 10% of new housing is delivered as designed to be wheelchair accessible and that the remaining 90% are easily adaptable for residents who are wheelchair users. The scheme proposes that 10% of units across the development, comprising a mix of unit sizes will be delivered as wheelchair user dwellings, the remaining units will be delivered to Building Regulation M4(2) specifications. This is supported and should be secured by condition, along with Building Regulations standards M4(2) and M4(3) in line with London Plan Policy 3.8 and Policy D5 of the of the Intend to Publish London Plan.

94 London Plan Policy 4.5 requires that hotel developments should ensure that at least 10% of bedrooms are wheelchair accessible. Policy E10 of the Intend to Publish London Plan requires that 10% of new bedrooms are wheelchair accessible (in accordance with British Standard BS8300-2:2018) or 15% of new bedrooms are accessible rooms in accordance with the requirements set out in British Standard BS8300-2:2018. The applicant should confirm what approach will be taken to ensure an appropriate amount of accessible serviced accommodation is provided. The borough should seek to secure this provision by condition.

## **Climate Change**

### Energy

95 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the Intend to Publish London Plan, the applicant has submitted an energy strategy, setting out how the development proposes to reduce carbon dioxide emissions. The

strategy comprises a range of passive design features and demand reduction measures. However, it is unclear if the proposed development achieves any carbon savings from energy efficiency measures due to the strategy's use of an electric baseline rather than a gas boiler baseline. The applicant is required to provide clarity on this, detailed energy comments outlining the required information have been forwarded to the applicant separate to this report.

96 Based on the information provided, the non-domestic element of the proposed development is estimated to achieve a reduction of 202 tonnes per annum (19%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development which meets the minimum requirement under Policy SI2 of the Intend to Publish London Plan.

97 Centralised heat pumps are being proposed in the form of a hybrid ASHP/CHP/gas boiler system. The system operation has the potential to be complex and the applicant should clarify how the system is proposed to operate through the annual and daily profiles, and how the technologies will interact. Further information on the heat pumps as set out in the detailed comments provided separately. The applicant is proposing to install 208 kWp of Photovoltaic (PV) panels equating to 168,085 kWh of electricity generation. They should confirm the net PV area. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised.

98 The carbon dioxide savings appear to meet the on-site target set within Policy 5.2 of the London Plan for domestic (pending the recalculation of the baseline) but fall short for the non-domestic uses. It is unclear whether the proposed strategy is not in line with the GLA Policy and therefore it should be reviewed. For the non-domestic uses, the applicant should consider the scope for additional measures aimed at achieving further carbon reduction.

99 The applicant should ensure that the remaining regulated carbon dioxide emissions will be met through a contribution to the borough's offset fund and should confirm the tonnes carbon dioxide of shortfall and the associated contribution.

#### Flood risk, drainage and water

100 The approach to flood risk management and the surface water drainage strategy for the proposed development complies with London Plan Policy 5.12 and 5.13 and Policy SI.12 and SI.13 of the Intend to Publish London Plan.

101 The proposed development does not meet the requirements of London Plan Policy 5.15 and Policy SI.5 of the Intend to Publish London Plan as it does not meet the water consumption targets of these policies. The applicant is required to provide water efficiency information on the non-residential components of the development.

102 The applicant should embed urban greening as a fundamental element of site and building design, in line with London Plan Policy 5.10 and Policy G1 and G5 of the Intend to Publish London Plan. Features such as street trees, green roofs, green walls, rain gardens, wild flower meadows, woodland and hedgerows should all be considered for inclusion. The applicant should calculate the proposed development's

Urban Greening Factor, as set out in Policy G5 of the Intend to Publish London Plan, and aim to achieve the specified target.

## **Transport**

### Great West Corridor

103 The Great West Corridor Local Plan review is supported by the Great West Corridor Transport Study (May 2019). The study outlines a package of potential transport interventions proposed in the Great West Corridor (GWC) and any new development coming forward within the area will be expected to contribute towards these.

### Vehicular Site Access

104 The existing vehicular access on Larch Drive will be removed and a new vehicle entry point will be provided from the A406 Gunnersbury Avenue in the north east of the site. A 75m slip lane will be provided on the A406 Gunnersbury Avenue to facilitate entry. The slip lane will provide access to the basement car park and servicing/coach parking facilities located at ground level. All vehicles will then egress the site onto the A4 Great West Road at the north west corner of the site.

105 Whilst the concept of the proposed highway layout is supported, a significant amount of further work is required, including highway modelling, to ensure that the changes proposed are acceptable in traffic and engineering terms, and are safe and deliverable. Visibility splays for the proposed site egress onto the A4 Great West Road along with Stage 1 Road Safety Audit which includes all the proposed changes to the highway are required to be provided and reviewed prior to determination. The applicant will be required to enter into a section 278 Agreement under the Highways Act 1980, for the works on the TLRN associated with the scheme.

### Healthy Streets and Vision Zero

106 The proposed development will see a significant increase in pedestrian and cycle trips to/ from the site and the local area. Pedestrian accesses to the site will be provided from the A4 Great West Road, Larch Drive and the A406 Gunnersbury Avenue. The applicant is proposing a new footway and cycleway along the site frontages including a new signal-controlled crossing across Gunnersbury Avenue and to signalise where the new footway/cycleway crosses the vehicular access into the site. Whilst the principle of the proposed changes is supported, further work is required, including highway modelling, to ensure that the changes proposed are acceptable in traffic and engineering terms.

107 The applicant is also required to model the feasibility of a new pedestrian crossing across the A4 Great West Road (beneath the M4) which would significantly improve the sites connectivity to the west and would provide a more direct route to Kew Bridge Rail Station. If feasible, a contribution to implement the crossing will be sought.

108 Whilst the TA does include a Healthy Streets/Active Travel Zone (ATZ) Assessment for five key routes within the vicinity of the site, this assessment doesn't

identify any measures for improvement beyond the site. Further consideration of improvements beyond the site is required.

109 The Mayor's Vision Zero ambition is the elimination of all deaths and serious injuries from London's streets by 2041. The Vision Zero approach requires reducing the dominance of motor vehicles and creating streets safe for active travel.

110 Whilst accident analysis has been provided it concludes that highway conditions or design are not a significant contributory factor to the accidents recorded. This analysis should identify measures which can be used to eliminate accidents and should demonstrate how the scheme will contribute towards the Vision Zero approach, especially given the predicted uplift in pedestrian and cycle trips.

### Car Parking

111 Whilst the proposed residential and retail car parking levels are within the Intend to Publish London Plan maximum car parking standards for the Outer London Opportunity Area; the applicant should note that the retail standards are not applicable to the proposed Showcase use. Notwithstanding this, it is acknowledged that the car parking provision has significantly reduced from that originally proposed. Therefore, subject to further detail being provided within the Car Parking Management Plan (CPMP), to be secured through the s106, the car parking provision proposed is considered to be acceptable on this occasion.

112 Disabled persons parking and Electric Vehicle Charging Points (EVCP) including passive provision will be provided in accordance with Intend to Publish London Plan standards for all uses which is supported.

113 A CPMP has been provided however further detailed is required before this is considered to be acceptable, including how the car park will be managed should demand exceed supply, a car park charging regime to be agreed with TfL and Hounslow prior to determination, and a comprehensive Variable Message Signage (VMS) system to be produced to manage on-site parking.

### Trip Generation and Modal split

114 Following the submission of the Trip Generation Response Note (TGRN) dated 13th December 2019. Significant further work is still required on the existing and proposed trip generation assessments before the trip generation assessment is considered to be robust. Net trips for all modes to be provided for all committed developments.

### Highway Impacts

115 In order to ascertain the impacts of the development on the highway, the applicant has agreed to undertake a full VISSIM model which will allow an assessment of the impact on general traffic and buses on the A406 Gunnersbury Avenue, Chiswick Roundabout and the A4 Great West Road and at local junctions and identify whether any proposed mitigation is required. This modelling is required to be completed prior to determination.

## Buses and Bus Infrastructure

116 Once the trip generation assessment has been agreed it will then be possible to establish what bus capacity contribution is required to accommodate the uplift in demand. The requirement for bus network enhancements within the area is identified in the GWC Strategic Transport Study.

117 To accommodate the proposed egress onto the A4, it is proposed to move bus stop R further east towards Chiswick Roundabout. Further consideration of this relocation is required, and any costs associated with relocating the bus infrastructure will need to be fully funded by the applicant.

## London Underground/Overground

118 The development is likely to result in a significant uplift in London Underground (LU) and London Overground (LO) trips over and above the existing situation at Gunnersbury Station. All Gunnersbury Station assessments done to date will need to be updated once the trip generation assessment has been agreed. There is significant concern regarding Gunnersbury Station's capacity, and it is therefore important that clarity is obtained on the implications of this development on the station so the required mitigation can be understood.

119 Gunnersbury Station currently does not have Step Free Access (SFA). A developer contribution will also be sought towards this.

## Rail

120 Kew Bridge Station and the trains which serve it are operated by South Western Railway (SWT). It will be for Network Rail and SWT to comment on the potential impact of the development on Kew Bridge station and the train services which operate through it. However, it is noted that Kew Bridge station is identified within the GWC Strategic Transport Study, as having capacity constraints during peak times. A contribution towards SFA at this location would be supported.

## Cycle Parking

121 A total of 508 long-stay spaces are proposed in the basement car park within 4 storage areas and 217 short-stay spaces will be provided at ground floor level.

122 Further detail is required on the type of long-stay cycle parking proposed. Furthermore, all cycle parking is required to be designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS). Shower and locker facilities should also be provided for those members of staff wishing to cycle to work.

## Taxi and coach parking

123 Given the nature of uses proposed on site it is considered that taxi/Private Hire Vehicle (PHV) trips have been significantly underestimated. There are also concerns with the provision of the drop-off area proposed within the basement. For a

development of this size an at-grade taxi rank for 5 spaces is required for pick-ups along with an area for at least 2 PHV's to pick-up and drop-off.

124 Further information detailing the location of the coach bays and how many coaches are estimated daily is required

### Delivery and Servicing

125 A Framework Delivery and Servicing Plan (DSP) has been provided. Further information is required to ensure the predicted service and delivery trips are robust, the service yard can accommodate the predicted level of demand and to ensure that residential deliveries are not undertaken illegally on-street.

### Travel Plan

126 Framework Workplace and Residential Travel Plans have been provided. In terms of the Workplace Travel Plan, there is little in the way of measures to encourage mode shift away from the private car for visitors nor are there any targets for mode shift for visitors. The Travel Plans should be secured, enforced, monitored and reviewed by as part of the s106.

## **Local Authority's Position**

127 Hounslow Council officers are currently assessing the application and anticipate amendments which will require a further round of consultation prior to the submission of an officer recommendation.

## **Legal considerations**

128 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Financial considerations**

129 There are no financial considerations at this stage.

## Conclusion

130 London Plan and of the Intend to Publish London Plan policies on; town centre uses, housing, affordable housing, urban design, inclusive access, energy, flood risk and sustainable drainage and transport are relevant to this application. Whilst the scheme is generally acceptable in principle, the application does not yet fully comply with the London Plan and the Intend to Publish London Plan as set out below:

- **Principle of development:** The mixed use redevelopment of the site, providing a Technology Showcase, new homes, hotel and retail and leisure uses within the an emerging Opportunity Area a is supported in principle, subject to verification that the creation of this out-of-centre 'destination development' would not undermine existing town centres.
- **Affordable housing:** The scheme would deliver 47% affordable housing by habitable room provided as Discount Market Rent (30% of units at London Affordable Rent levels, 35% of units at 65% OMR and 35% of units at 80% OMR). The proposed provision of 30% DMR at LAR levels is not supported. Further discussion on the affordability of rents across the DMR tenure is required. The proposed covenant length is not acceptable and should be revised to align with the part B of Policy H11 requirement. Further clarity on compliance with part B of H11 is required. On the basis of the aforementioned concerns the proposed affordable housing provision does not currently qualify for consideration under the Fast Track Route.
- **Children's Play space:** The development should reconsider the location of the proposed child play space, particularly with regard to the location of the 0-5 year old doorstep play provision
- **Urban design:** The development layout is broadly supported, however, the articulation of massing requires refinement in some areas and the overall height exceeds that envisaged within existing and emerging the local policy framework. Further urban design work and justification is required to address these issues..
- **Heritage:** The proposal would result in less than substantial harm to the Strand on the Green Conservation Area and Grade II and II\* Listed buildings, at 64-71 Strand on the Green, the Gunnersbury Park Conservation Area, the Kew Gardens designations and the Grade I Listed Orangery as an asset in its own right. However, insufficient information has been provided to assess the impact on Kew Green Conservation Area. A rendered version of view 9 should be submitted to enable a full assessment of the proposals impact on the Kew Green Conservation Area and Kew World Heritage Site buffer zone.
- **Inclusive access:** The applicant should confirm what approach will be taken to ensure an appropriate amount of accessible serviced accommodation is provided.
- **Sustainable development:** The applicant should provide further information on energy efficiency savings, the proposed Centralised heat pump system and PV provision. The shortfall in CO2 reductions should be met through an offset contribution. The applicant is required to provide water efficiency information on the non-residential components of the development.

- **Transport:** Further work is required with regard to highway alterations to the TLRN, existing and proposed trip generation assessments and VISSIM modelling. Further to the required analysis work, contributions towards improved bus capacity and infrastructure and Gunnersbury Station are likely to be required. Further matters in relation to feasibility work on new pedestrian crossings, a Car Parking Management Plan, Taxi, cycle parking, delivery and servicing and a travel plan should also be addressed.

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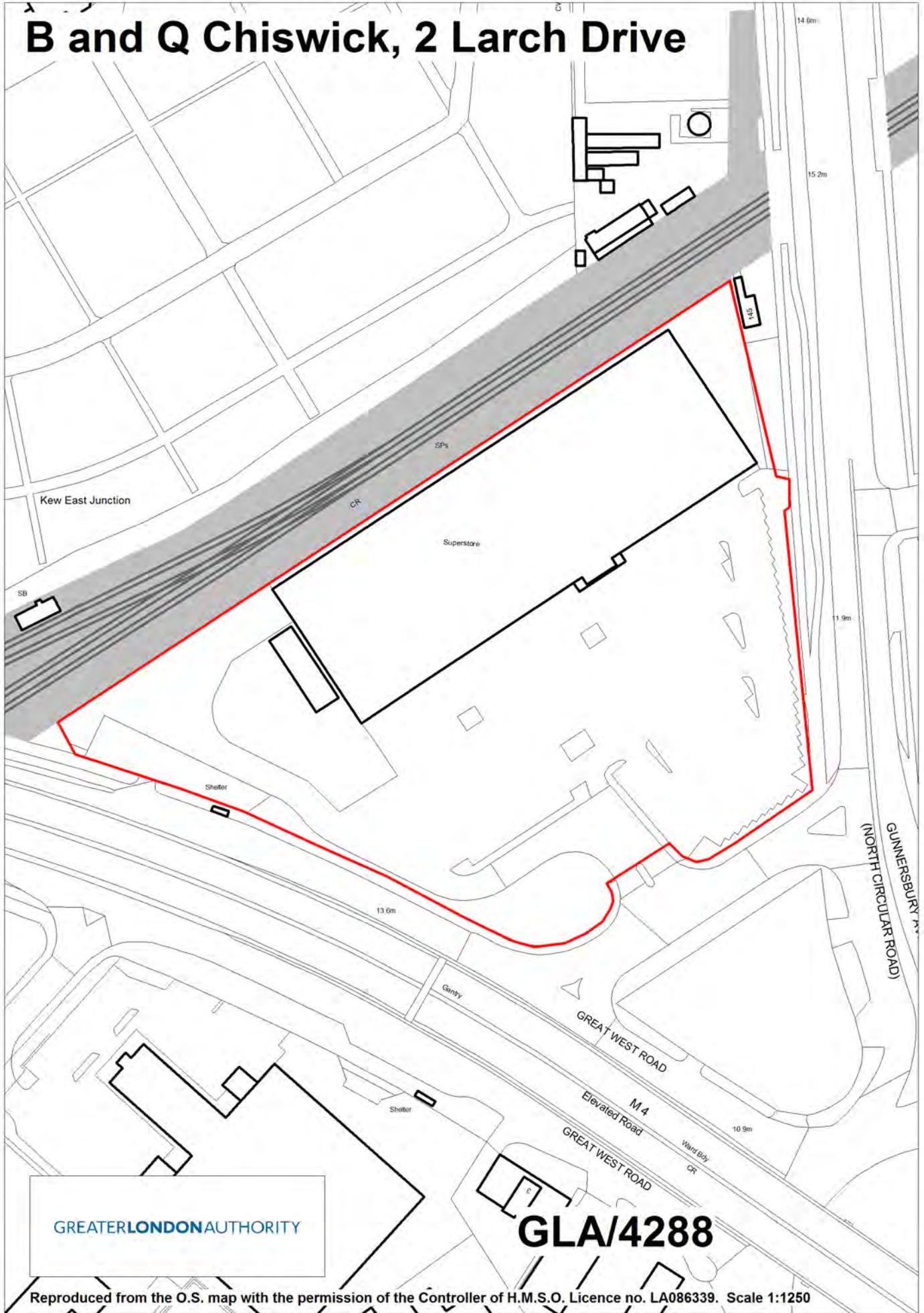
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# B and Q Chiswick, 2 Larch Drive

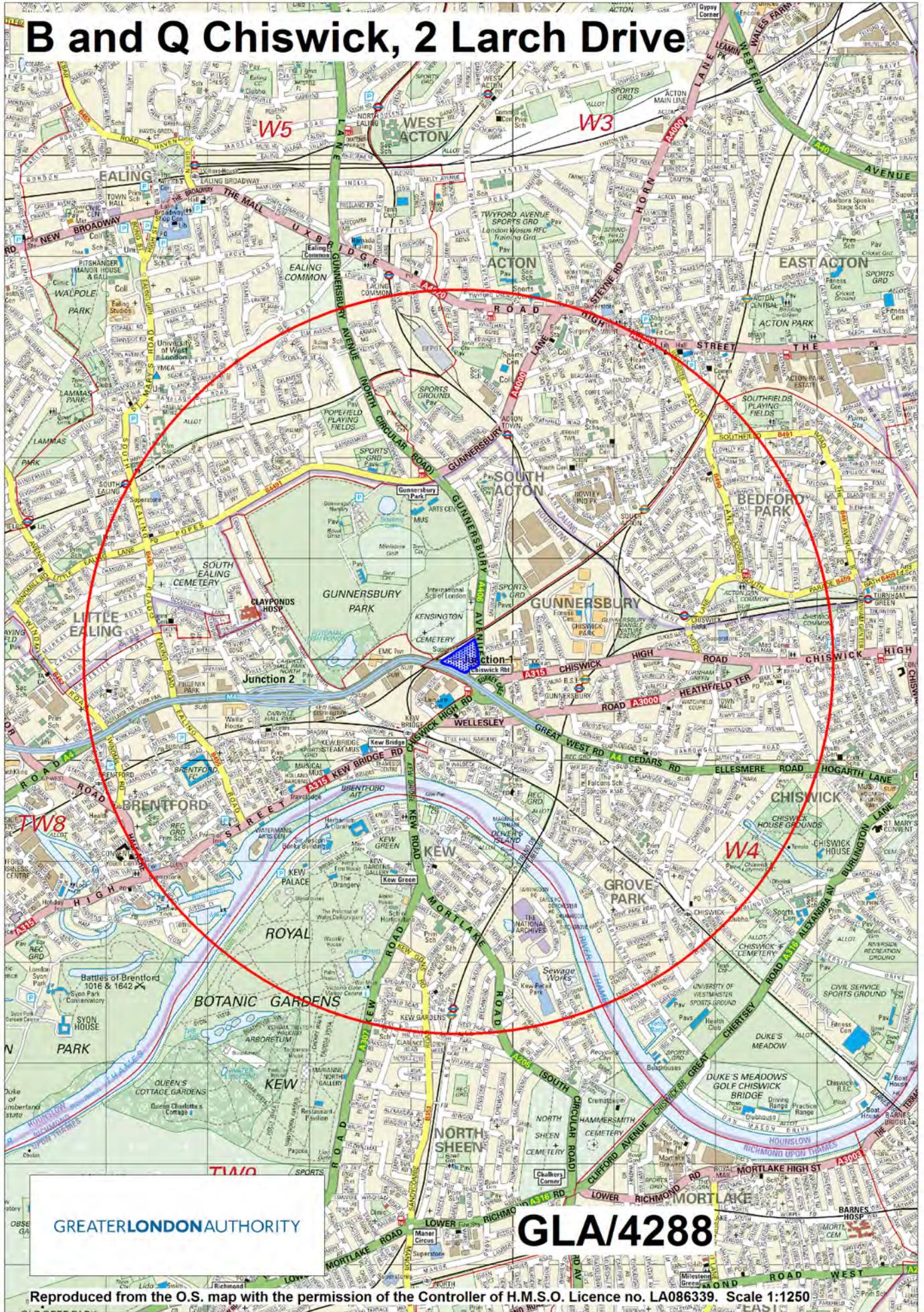


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