

Shane Baker, Deputy Head of Growth and Opportunity Areas,
Housing, Planning and Communities,
London Borough of Hounslow,
7 Bath Road TW3 3EB
By email.

Ref: BCC867
February 12 2020

Dear Shane,

**Planning Application: The Fourth Mile
B&Q site: Larch Drive, Brentford East,
Refs: (P/2019/3954 and 01578/2/P3).**

The Planning Consultative Committee of the Brentford Community Council met on February 10 2020 and resolved to ask that this application should be refused.

The Planning Consultative Committee fully support the comments sent to you by Brentford Voice. This paper has been prepared to be read with those comments to avoid duplication.

1. Pre-Application Proposals.

A pre-application presentation was made to the BCC in July 2019.

Our views were sent to you and the applicant (BCC 859, attached).

2. Planning Objectives.

The D&AS states (page 44) that the "Fourth Mile project seeks to respond to the desire and vision of the Great West Corridor Masterplan"

The mixed-use nature of the application does respond, but the application does not follow the Site Requirements set out for site 35 which ask for:

"a consistent and visible commercial frontage against the Great West Road and the North Circular to form a buffer between this and non-employment uses on the site which should be sheltered away from business frontages, access and servicing."

The site Requirements should be followed to ensure that the residential development provides suitable healthy accommodation for families of all sizes.

3 The application scheme.

Minor adjustments have been made since June to the height of some blocks. The orientation of those facing the A406 has been altered. Little change has been made to the proposed land uses which now comprise:

Technology Showcase (sui generis) 33,054m²
Retail space (A1/A3) 11,788m²
219 bedroom 4* hotel
Flexible leisure and conference (D2) 1,415m²

258 Residential Units: block A 83 units
 block B 99 units
 block C 76 units

Affordability mix: 40% units 46% habitable rooms. Studios/3BR: 13/39/38/10%
Parking: 150 Technology Showcase, 150 Retail 150 Residential.
Cycle Parking 727.
Amenity/Landscaping
Advertisements (2) 32.5mx17m and 17mx9.5m

4. The Technology Showcase.

The Technology Showcase combines an exhibition space, 23 lettable units and a conference centre. It is claimed that it would be the world's first integrated technology showcase, with exhibition and conference spaces.

As an innovative proposal there is no precedent to enable a judgement to be made of its chance of success.

If it attracts sufficient support to make it viable visitor numbers would be 1.5/2 million pa. If it is not viable it will not attract development finance and there is a danger that this important site could only be developed for residential units, contrary to the policies in the GWC Review.

Size: At 34,457 m² the showcase and conference centre would have a similar floor space to several major buildings in London which house national exhibitions, ie

Olympia	20,000m ²
Earls Court 1	40,000m ²
Earls Court 2	17,000m ²
Alexandra Palace	6,400m ²
Royal Agricultural Hall (Design Centre)	60,000m ²

This location is not suitable for a centre which would need to attract national and international support.

5. Retail Space.

This site is isolated by dual carriageways so retail space on the site will only be required for residents and for visitors to the showcase complex. The floor space required for residents could be quite modest (possibly equal to the F&B area proposed). The viability of the rest of the retail area would depend entirely on the number and interest of visitors to the showcase.

We are concerned that so much parking is allocated to the retail uses on this site. The provision is likely to lead to increased trips to and from the site which already suffers from traffic congestion.

Any proposal to establish retail on this site to serve the local population could undermine the viability of shops in West Chiswick and in the Brentford Town Centre contrary to Local Plan (2015) policy TC2.

6. Hotel

Several hotels are included in the Great West Corridor Plan, including one next to the football stadium, which has planning consent, The proposal to build a high class hotel on the Gillette site was not funded.

A hotel on this site would be welcomed only if it can be demonstrated that it would contribute to the success of the showcase complex.

7. Residential.

Housing in towers exposes single aspect flats to noise pollution and poor air quality. The A406 frontage should be non-residential for the same reason as apply to the A4/M4 frontage as stated in the Great West Corridor Site Allocation 35 Site Requirements.

Affordable housing is welcome, especially family accommodation.

Residential accommodation should only be in units facing away from the main roads which are noisy and heavily polluted.

It is noted that the residential tower blocks have only one means of escape in case of fire. While this complies with current building regulations there is increasing pressure to require a secondary means of escape following the

Grenfell Tower disaster. The Royal Institute of British Architects is recommending a second means of escape with towers over 11m high.

As this scheme cannot be built out quickly it would be desirable to ensure that a secondary means of escape could be provided if required.

It is also noted that an increasing number of reports are being published showing concern over the suitability of sealed residential accommodation, particularly for children. One of the latest published by the Royal College of Paediatrics and Child Health and the Royal College of Physicians say “that they have found growing evidence that respiratory problems among children may be exacerbated by indoor air pollution in homes, schools and nurseries”

It should be a priority to ensure that all new housing provides healthy accommodation.

8. Amenity/ Landscaping.

The central square is small, overlooked by high buildings on all sides, in shade most of the time and is surrounded by retail units. While it provides a useful part of the showcase/hotel and retail complex it contributes nothing to the amenity of residents.

None of the flats have private balconies. Instead winter gardens are provided for all but the studio flats, which have no private amenities. Many of the studio flats are north facing single aspect units.

We do not accept that high rise flats with sealed windows, forced ventilation and winter gardens in lieu of balconies provide acceptable accommodation especially for families. Well planned housing should provide for a healthy life-style within the flats and in the open spaces around them.

The D&AS (page 158) claims that “Gunnersbury Park provides amenity right next door to the (site)”. This is not true. Access from the site to Gunnersbury Park would be along pavements to the A4 and the A406 which are both heavily trafficked and highly polluted dual carriageway roads.

The access from the site to Gunnersbury Park are quite unsuitable for pedestrians, especially unaccompanied children.

9. Advertisements.

The computer image on page 136 of the D&AS shows how the lettable units would provide a continuous line of individually lit exhibition areas on five

superimposed levels each designed to attract the attention of motorists passing the site on the M4.

These units would effectively be advertisements for competing companies and as they are internal spaces they would not be subject to any planning control. As they are likely to command high rents it must be expected that the units would be continuously modified to improve their visibility and to compete with their neighbours.

In addition, two excessively large and over lit advertisement panels are proposed.

Taken with possible development on the adjacent site of the former Nat West bank the impact of this scheme would be totally unacceptable.

10. Impact of Proposed Development

The impact of this proposal should not be considered in isolation, but should be assessed collectively with the adjoining proposed developments: Chiswick Curve/Citadel site, Citroen site, together with the football stadium development.

Together, these developments will create an unbroken mass of high buildings, contrary to intentions expressed in planning guidance at local and city levels.

Even taken in isolation, the proposal, in attempting to grossly overdevelop the site by placing tall buildings so closely, has created an unrelieved over-bearing mass of building which will inevitably harm its surroundings. These include residential areas, parks and significant heritage assets.

We endorse the views expressed by the Kew Society, regarding the impact on the World Heritage site, also those of the Friends of Gunnersbury Park and Museum regarding the impact on the Park. The site is just to the south of the Park, so will deprive large areas of the park of sunlight for some part of the day, especially in the winter months.

The proposal will have a harmful impact on local Conservation Areas. It will be clearly visible from both sides of the Thames around Strand n the Green and from Kew Green.

Given the scale of proposed and established developments in the area, the individual applications must be coordinated to present a coherent three-dimensional townscape which has fully considered its impact on the neighbourhoods and heritage assets which surround it. We do not see any evidence that this is the case.

11. Access.

The Great West Road Corridor Plan: Issues Consultation (December 2015) stated at Issue 4, para 2:

“... game-changing new transport infrastructure improvements are required for the corridor to achieve the estimated capacity of around 28,700 jobs and 1,600 new homes identified in the Site Capacity Study”

Although the paragraph also states that the Council has already begun this process and is working closely with TfL....” There is as yet no secure prospect that the £250 million + required to complete the Golden Link and achieve the desired timetable to provide, by the mid 2020s a connection to Crossrail and the High Speed 2 at Old Oak Common is secure.

As the Review papers repeatedly spell out the infrastructure improvements must be in place before new development are consented and built out.

The Fourth Mile application would provide 18% of the 1,600 new homes required to meet the target in the Site Capacity Study.

It would be inappropriate to provide the housing accommodation proposed in this application before the Golden Link is operational.

It is understood that, if successful, the Technology Showcase would expect to draw 1.5 to 2.0 million people each year. This equates to approximately 4,000+ visitors each day. However, it is likely that there would be a peak demand at weekends. It is at weekends that the Brentford Stadium seating 17,500 people and Kew Gardens would both draw large crowds.

Additionally vehicular movement on the A4 and the A406 and access to these sites access will be adversely affected by the Cycle superhighway from Olympia to Brentford, now being constructed and by the increased number of at grade pedestrian crossings to the A4 proposed in the Great West Corridor Review and in the proposals for this site.

The application for this site should not be approved unless it can be successfully conditioned to ensure that the scheme is not built out until the Golden Link is operational.

12. Building Mass and Design Quality.

It is appreciated that design quality is subjective, but we are aware of the growing hostility to the mass of closely packed high rise developments in Brentford East.

The environment that is being created is not one that is suitable for young families or for healthy living.

The repetitive use of large panels and of brickwork built in contrasting colour to break up the oppressive mass of buildings do little to make Brentford East attractive to visitors or residents.

It would be desirable to review the design of this project.

13. Statement of Community Involvement.

Chapter 3 of the Design and Access Statement describes the Community Involvement in the development of the scheme. It correctly notes that certain major changes in the mix of uses and the design concept were made in the early stages of the process.

However, by the summer of 2019 the design became more fixed. Minor amendments were made to the height of the tallest buildings to reduce the harm they could cause to heritage assets, but the buildings remained at greater heights than those shown in the Great West Corridor Review (Site location 35: site Requirements).

At the request of the LPA the orientation of the tower blocks facing the A406 was rotated, but this still left half of the residential accommodation facing what is recorded as one of the most polluted roads in the UK.

The presentation to the BCC is recorded in the D&AS, but there is no record of the fundamental objections to the application made by BCC members nor to BCC859 (attached) which spelled out the reasons why the application in its present form should be refused.

Please will you include these comments in your report to the Planning Committee

Yours sincerely

Denis Browne, Chairman, Planning Consultative Committee
Brentford Community Council.