



Planning & Development  
London Borough of Hounslow,  
Hounslow House  
7 Bath Road  
Hounslow  
TW3 3EB

For the attention of Shane Baker, Deputy Head of Opportunity Areas and Growth

29 January 2020

Dear Sir,

Planning Application: 2 Larch Drive, Chiswick, London W4 5QL  
Planning Application ref: P/2019/3954

The Kew Society (registered Charity no. 1173016) is more than 100 years old and dedicated to enhancing the beauty of Kew and preserving its heritage. The Society has a fee-paying membership of over 800.

The Kew Society wishes to object to this application on a number of grounds. This objection letter focuses on four specific topics:

- Traffic volumes
- Transport facilities
- Pollution
- Impact on heritage assets

We have serious concerns on a number of other issues which we will not address in detail in this letter, but we support the objections submitted by a number of other local amenity societies (e.g. the Brentford Community Council, the West Chiswick & Gunnersbury Society, the Strand on the Green Association). These issues include:

- The viability of the proposed Technology Showcase scheme. There has been little information or research provided in the planning application to indicate a sufficient level of demand for the facility at this location.
- The viability of the proposed high-end retail offering and four-star hotel: we see little evidence that there would be sufficient demand for either in such a congested location, particularly given the availability of other hotels in the area. The viability of the hotel is closely linked to the viability of the Showcase. There is little evidence also that the hotel, the retail offering or the Showcase represent a “range of uses which would support the Brentford Stadium Quarter” (as required in the “Site Allocations – Site 35” section of the Local Plan Review).
- In the event the hotel and Showcase prove unviable, it is unclear if they could be converted effectively into alternative uses given the constraints of the site. The location of the Showcase beside the A4/M4 is not suited to conversion to apartments.
- Light spillage/pollution from the proposed Showcase buildings and the large-scale advertisements on the sides of the buildings is likely to have an adverse effect on nearby residential buildings and on Gunnersbury Cemetery and Gunnersbury Park. The large-scale advertisements are likely to provide an unwise distraction to motorists on this elevated section of the M4 given the other advertisements already in place along this stretch.
- Playspaces for children aged 12+: the Design & Access Statement (p302) states that “children of 12+ years are expected to use the play and recreation facilities in the nearby Gunnersbury Park”. We do not view this as acceptable given the children would have to walk along the highly polluted A406 pavement for some distance to access the Park.
- Very restricted access to natural light in Hudson Square itself and the residential buildings in this development.



Due to the intensive level of redevelopment proposed and underway in the area between the Express Tavern (A205) and the beginning of the North Circular (A406), the Kew Society strongly recommends that the proposed B&Q redevelopment at 2 Larch Drive needs to be assessed in the context of other nearby developments underway, approved or under consideration, including the Brentford Football Club Community Stadium and its surrounding “enabling development”; the Citroen site; 1-4 Capital Interchange Way; the “Chiswick Curve”/ Citadel; and Wheatstone House. Other potential forthcoming developments in the neighbourhood, which could add to the cumulative impact of these schemes, include the possible redevelopment of the Brentford Leisure Centre in Kew Bridge Road, and the redevelopment of the site at 250 Gunnersbury Avenue, for which a pre-application was submitted in 2017. All of these schemes affect most of the issues raised below and on a cumulative basis their impact is highly significant.

### **London Borough of Hounslow – Local Plan**

Since the Local Plan Review has yet to be submitted to a public inquiry, we understand that this application would be a departure from the Local Plan 2015. The application is therefore considered premature and should be rejected on these grounds.

### **Traffic Volumes**

The stretch of the A406 between Chiswick Roundabout and Hanger Lane has already been classified as the most congested stretch of road in the UK (*source: Inrix*). Research (see Appendix 1) indicates that in 2018, there were, on average, 144,623 daily traffic movements in the immediate vicinity of the Chiswick Roundabout, a **10.6% increase** from the 2015 figure (*source: DfT*), and there is every reason to believe this figure will continue to increase. The implications for traffic circulation – and pollution – are dire, implying worsening gridlock in the area.

There are a number of factors that are likely to increase traffic flows in this area over the next few years:

- The planned introduction of the ULEZ to the eastern edge of the A406 in October 2021 is likely to divert many petrol cars/vans which do not meet Euro 4 standards and diesel cars/vans which do not meet Euro 6 standards on to the A406 and roads to the west of Brentford, thus increasing traffic flow.
- The introduction of the Cycleway 9 is likely to divert more traffic onto the Chiswick Roundabout due to the closure of Wellesley Road to vehicles. Currently this is a well-used route from Turnham Green to Chiswick High Rd which avoids Chiswick Roundabout.
- The large number of new residential developments in this area, and the limited car parking spaces available to these residents, is likely to result in a substantial increase in journeys for online shopping deliveries (e.g. Amazon), ride-hailing vehicles (e.g. Uber) and minicabs.

Clause 7.152 of the Planning Statement states that “the junction capacity assessment of weekday PM and Saturday periods has demonstrated that Chiswick Roundabout and Larch Drive/Gunnersbury junction are currently operating over capacity.” We believe this will only get worse as the new developments come on stream. Given the likely increase in Amazon-style deliveries and Uber-style journeys to and from the site, we do not believe the claim (Planning Statement 7.151) that “Overall, the proposed development is predicted to a net beneficial impact on vehicular trips in the AM and Saturday peaks and a negligible impact in the PM peak” is realistic.

We believe this is grounds for refusal of the proposed scheme under section 109 of the NPPF (2019) which states that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or **the residual cumulative impacts on the road network would be severe.**”

### **Public Transport**

With visitor numbers to the Technical Showcase centre and retail shops estimated to be in the range of 1.5 – 2m people p.a., this equates to around 5,000 - 5,500 visits per day – or say 10,000 - 15,000 per day if visits are, as likely, concentrated at weekends, many coinciding with visits to the nearby Brentford stadium with its capacity of



17,500 seats and the Royal Botanic Gardens Kew (2 million visitor p.a). Many visitors to the latter arrive via Kew Bridge Station.

Assuming, based on historical precedent (the 2011 census), that 40% of these visitors would arrive by underground or train, this would represent an increase in combined annual total entries and exits at nearby Gunnersbury and Kew Bridge Stations of around **40%**.

There are no imminent plans or programmed funding for an increase in capacity at Gunnersbury Station, which is currently extremely overcrowded at rush hour, and the same is broadly true of Kew Bridge Station, where access is constrained.

Clauses 7.154 and 7.155 of the Planning Statement state that there will be marginal/negligible effects on peak time capacity at these stations (tube or overground) which we find extremely difficult to believe.

This is likely to severely reduce the attractiveness of the four star hotel and high-end retail to its target demographic.

The Design & Access Statement (p24) that “Critically important for development of the area are public transport improvements including new links to HS2 and Crossrail.” We see no evidence that these will be forthcoming in time.

Clause 7.140 of the Planning Statement states “The NPPF seeks to locate developments which generate significant amounts of movement in areas of high public transport accessibility”, stating that: “... new developments that will give rise to significant numbers of new trips should be located either where there is already good public transport accessibility with capacity adequate to support the additional demand or **where there is a realistic prospect of additional accessibility or capacity being provided in time to meet the new demand.**” As things stand, we do not believe this requirement can be met: if it can be, we would like to see evidence.

The draft New London Plan states that “where existing public transport capacity is insufficient to allow for the travel generated by proposed developments .... planning permission may be **contingent on the provision of necessary public transport and active travel infrastructure**” (policy T4 para D). We see no evidence of enhance provision of public transport being provided, so the application should be refused on these grounds.

## **Pollution**

The Kew Society gave evidence to the 'Chiswick Curve' public inquiry in the Summer of 2018, in which we focused particularly on the pollution implications of that scheme. Many of the issues raised in our Proof of Evidence at that inquiry (see Appendix 2) are relevant to the Hudson Square application. In that Proof of Evidence submission, we pointed to the appallingly toxic air quality around the Chiswick Roundabout, adjacent to the Hudson Square site. Our Proof of evidence was not challenged at the Chiswick Curve Inquiry. Evidence since then (Appendix 1) serves only to increase our concerns over pollution levels. Nitrogen dioxide levels at the Roundabout and in the surrounding area have been in excess of the UK/EU statutory limit, frequently markedly, over the last 4 years. The London Atmospheric Emissions Inventory shows that Nitrogen Oxides levels will remain at unacceptably high (and illegal) levels in 2020 and in the foreseeable future (Appendix 1). Such high levels are dangerous to human health and are especially associated with increased morbidity and mortality from respiratory disease ( *Every Breath We take; the lifelong impact of air pollution. 2016. Royal College of Physicians Report, London*).

Particulate emission levels (PM<sub>10</sub> and PM<sub>2.5</sub>) in the area around the proposed Hudson Square development are within UK/EU statutory limits ( Appendix 1). However it is noteworthy that the UK Government's Clean Air Strategy (2019) promises to reduce PM<sub>2.5</sub> concentrations everywhere and to halve the number of people living in locations above the WHO guideline level of 10µg/m<sup>3</sup> by 2025. The PM<sub>2.5</sub> levels in the area of the proposed development markedly exceed 10µg/m<sup>3</sup> (Appendix 1). Adoption of the WHO guideline, or an even lower level of PM<sub>2.5</sub>, is absolutely necessary since these particles are particularly dangerous for human health, contributing to



deadly diseases such as heart disease, strokes, chronic kidney disease, COPD, dementia, type 2 diabetes hypertension, lung cancer and pneumonia (Bowe B et al. *JAMA Netw Open*. 2019;2(11):e1915834. doi:10.1001). For this reason no new residential property should be built in the area around Chiswick Roundabout until measures have been taken which detoxify the atmosphere there and the application should be refused for that reason.

The increase in overall traffic levels, as indicated above, the likely local increase in Euro 6 non-compliant vehicles with the introduction of the ULEZ in 2021, and the continuing concern that even new diesel cars markedly exceed statutory particle emissions on the road, as compared to in testing laboratories (New Diesel Car Emissions spiking at 1000 times their normal level due to Filter Cleaning, *airqualitynews.com*. 13.01.20), predicts that the air quality in the area of Hudson Square is unlikely to improve in the foreseeable future and may deteriorate further.

Section 180 of the NPPF (2019) states that “Planning policies and decisions should also ensure that new development is appropriate for its location **taking into account the likely effects (including cumulative effects) of pollution** on health, living conditions and the natural environment, as well as **the potential sensitivity of the site or the wider area to impacts that could arise from the development**” and section 181 states “Planning policies and decisions should **sustain and contribute towards compliance with relevant limit values or national objectives for pollutants**, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas”. We believe that the proposed scheme, particularly on a cumulative basis with the other nearby schemes, fails to respect the requirements of these two clauses of the NPPF.

Furthermore, the draft London Plan states (Chapter 9 – Policy S11) that “London’s air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced: Development proposals should not: (a) lead to further deterioration of existing poor air quality, (b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, (c) reduce air quality benefits that result from the Mayor’s or boroughs’ activities to improve air quality, (d) create unacceptable risk of high levels of exposure to poor air quality”. We do not believe the proposed development, singly or cumulatively, respects these requirements.

The Great West Corridor Masterplan and Capacity Study (July 2019) states (p56) that “Air pollution is a significant issue along the Great West Corridor. This is a direct result of the heavy traffic along the A4 / M4.” Also that “the North and South Circular roads also suffer from high levels of pollution with levels varying between 50 - 60 µg/m<sup>3</sup> NO<sub>2</sub>. A hot spot for pollution can be seen at the junction between the South Circular and the A315 just to the north of Kew Bridge.” This is why the Technology Showcase building has been positioned parallel to the M4/A4 road, to provide a barrier between the M4/A4 and the buildings, and why the residential blocks have been angled away from the M4/A4. But these residential buildings are still adjacent to the A406, on the most congested stretch of road in the UK, and virtually on the Chiswick Roundabout pollution hotspot.

This location contravenes Policy P3(f) of the Great West Corridor Local Plan Review Volume 4 – Regulation 19 Consultation which requires “new residential development to be designed to mitigate any noise and air quality issues and **is sensitively located away from the A4/M4 and north circular roads**”.

### **Heritage Assets**

The NPPF (2019) states:

- Section 190: “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (**including by development affecting the setting of a heritage asset**)”;
- Section 193: “When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.**”



- Section 194: “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), **should require clear and convincing justification. Substantial harm to or loss of:** a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and **gardens**, and World Heritage Sites, **should be wholly exceptional**”.
- Section 195: “Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss...”.

Section D8(C) of the draft London Plan states “Proposals should take account of, **and avoid harm to**, the significance of London’s heritage assets and their settings. **Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area** 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.”

The London Borough's Local Plan section CC3 states that tall buildings “should be carefully placed so as not to create a wall of tall buildings, ensuring they relate sensitively to surrounding residential areas and **do not have a significant adverse impact on the setting of, or views from, heritage assets including Gunnersbury Park, Royal Botanic Gardens Kew World Heritage Site etc**”. This section also states “A tall building proposal should be “designed to give full consideration to its form, massing and silhouette, **including any cumulative impacts and the potential impact of this on the immediate and wider context.**”

In our opinion, the impact of the proposed development – particularly at a cumulative level, with other proposed nearby schemes, particularly the Citroen site and the Chiswick Curve/Citadel – represents an unacceptable level of harm to the setting of, and vistas from Royal Botanic Gardens Kew, particularly from the Orangery. It is clear from View 12 of the Townscape, Heritage and Visual Impact Assessment that the proposed development can be seen above the roofline of the Orangery when viewed from the south (see View 12 - “Proposed”); and that the cumulative effect of the nearby developments will be a more or less continuous and unattractive skyline of tall buildings to the west and east of the Orangery (see View 12 - “Cumulative”). We disagree with the assessment of View 12 - “Proposed” that the Magnitude of the Impact, and the Scale and Nature of its Effect, are “Negligible”; and that the Magnitude of the Impact of View 12 - “Cumulative” is “Small”, and the Scale and Nature of this Effect is merely “Moderate/Minor Adverse”.

Also, we believe there is harm to other vistas, including looking north across Kew Green; across the Thames to Strand on the Green; and from Gunnersbury Park.

As such, the proposed scheme is contrary to the NPPF, the draft London plan and London Borough of Hounslow's Local Plan.

We note also that the London Borough of Hounslow's Site Allocations – Local Plan Review (July 2019) details the Hudson Square development as site number 35 (page 74). This states that “**Heights of new development must be in conformity with Great West Corridor East Place Policy and Great West Corridor Masterplan**”. The Masterplan contains a map (figure 4.18, page 143) with the “appropriate heights” of the proposed developments. **The appropriate heights on the map for the Hudson Square scheme are 51m/61m AOD, 44m/54m AOD, and 35m/48m AOD.** Section 7.7.6 states that “Tall building proposals in identified locations would not normally be expected to be higher than the appropriate height”.

However, the AOD heights of the three residential blocks are 70.5m (Block C), 60.9m (Block B) and 57.7m (Block A), and the hotel is 67.3m AOD. These heights are significantly above the “appropriate heights” specified in the Masterplan and for this reason are, in our view, unacceptable.



*We would be grateful if you would acknowledge receipt to [planning@kewsociety.org](mailto:planning@kewsociety.org).*

Yours Faithfully,

John Ricketts  
Planning Committee  
The Kew Society