

Application reference: 24/2825/CON

Date application received	Date made valid	Target report date	8 Week date
12.11.2024	12.11.2024	07.01.2025	07.01.2025

Site:

27-1053 Great West Road, Brentford, London, TW8 9BW

Proposal:

Redevelopment of the site comprising of demolition of existing buildings and erection of a mixed use scheme comprising 856 homes (Use Class C3); commercial and retail use (Use Class E/B2/B8); plus associated highway and public realm works, landscaping, car and cycle parking, infrastructure and other associated works.

Status: Pending Decision (If status = HOLD please check that all is OK before you proceed any further with this application)

APPLICANT NAME

AGENT NAME

Development Management
Hounslow House, 7 Bath Road
Hounslow
TW3 3EB

DC Site Notice: printed on and posted on and due to expire on

Consultations:

Internal/External:

Consultee

LBRUT Transport
14D Urban D
LBRUT Environmental Health Air Quality
LBRUT Education

Expiry Date

29.11.2024
29.11.2024
29.11.2024
29.11.2024

Neighbours:

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History: Planning – Appeal – Enforcement – Building Control

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Recommendation:

The determination of this application falls within the scope of Officer delegated powers - YES

I therefore recommend the following:

1. OBJECTION

Case Officer (Initials): James Philips

Dated: 17 December 2024

I agree the recommendation:

Team Leader Lucy Thatcher

Dated: 17 December 2024

This application has been subject to representations that are contrary to the officer recommendation. The Head of Development Management has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

Head of Development Management:

Dated:

The following table will populate as a quick check by running the template once items have been entered into Uniform

SUMMARY OF CONDITIONS AND INFORMATIVES

CONDITIONS

INFORMATIVES

U0096393 Officer Comments

OFFICERS REPORT:

The proposal is for the “Redevelopment of the site comprising of demolition of existing buildings and erection of a mixed use scheme comprising 856 homes (Use Class C3); commercial and retail use (Use Class E/B2/B8); plus associated highway and public realm works, landscaping, car and cycle parking, infrastructure and other associated works“ at 27-1053 Great West Road, Brentford, TW8 9BW, within the London Borough of Hounslow.

This report forms the consultation response to the London Borough of Hounslow associated to the above development – reference P/2023/3208

Consultation

In forming this consultation response, officers consulted Highways, the Urban Design and Conservation Team and Air Quality officers. Their responses are embedded within this report.

Professional comments:

Heritage and Townscape

The London Borough of Richmond-upon-Thames (LBRuT) objected to the previous scheme for this site because it was considered that the information submitted did not make clear the full impact of the proposals and that there would be 'less than substantial' harm to the significance of heritage assets in the borough, particularly Royal Botanic Gardens, Kew World Heritage Site (WHS), Kew Green Conservation Area and listed buildings in Kew. It was thought that the proposals would negatively affect the setting of the WHS as the sense of isolation from the outside world would be spoilt by the intrusion of the towers in the proposed development on the skyline. Similarly, the setting

of the listed Kew Palace and Orangery would be negatively affected, as would Kew Green and the listed buildings surrounding it forming part of the Kew Green Conservation Area.

In the revised proposals, Buildings A-D have been reduced by between 1.75 and 20m (1 and 6 storeys) in height, while Building E has been increased by 8.15m (3 storeys). The proposed buildings would range from 60m to 75m in height. There have also been alterations to set back the podium from the building line and to materials, refining and lightening the proposed brick façades. Additional information has been provided, including addendums to several reports, notably a Design and Access Statement Addendum and Environmental Statement Vol. II: Built Heritage, Townscape and Visual Impact Assessment Addendum.

Overall, it is considered that the visual impact of the revised development is somewhat reduced as a result of the lower overall height. Nevertheless, there is still harm caused to heritage assets and townscape in LBRuT. For this reason, LBRuT objects to the proposed development. Of particular concern are the following viewpoints:

1. Royal Botanical Gardens, Kew, World Heritage Site:

- There are still several locations within Kew Gardens where the proposed development would be visible: The Great Lawn and views towards the Orangery (AVR11), The Hive (AVR14), and Kew Palace (AVR17).
- The Royal Botanic Gardens, Kew World Heritage Site Management Plan notes that:
The WHS has a very specific set of relationships with its setting, which are an integral part of its design, its experience and therefore of its OUV. Management of change within the wider environs of the WHS is critical to the conservation of OUV. Existing development in the setting of the WHS has already harmed the site's OUV and our ability to appreciate it. Further unsympathetically designed and/or sited development would result in increased cumulative harm.
- The Great West Road Masterplan states that it '*has carefully located and modulated tall buildings to avoid causing any additional harm to Kew Botanic Gardens WHS and minimise impact on other heritage assets*'. Figure 7.17 gives a maximum height range for this site of 50-60m in height. The revised proposals are at a maximum of 75m in height. The proposals would not be in line with heights given in the Great West Road Masterplan and, consequently, would cause harm to the setting of the WHS.
- While reduced, the height of the proposed development would still mean that the building would be visible above the tree line from these locations. The intrusion of built forms into views from within Kew Gardens would damage its sense of isolation from the outside world which is part of its character and landscape design as noted in The Royal Botanic Gardens, Kew World Heritage Site Management Plan and Great West Road Masterplan (7.7.3). The experience of Kew Gardens and its Outstanding Universal Value (OUV) would therefore be diminished.
- It is the opinion of LBRuT that the proposed development would harm the setting and OUV of the WHS, both individually and cumulatively with other nearby development, contrary to the Great West Road Masterplan, the Royal Botanic Gardens, Kew WHS Management Plan and London Plan Policy H2.

2. Kew Green (Listed Buildings and Conservation Area):

- The Kew Green Conservation Area Appraisal and Management Plan states that: '*The open view across the Green and proximity to the River make it exceptionally sensitive to tall developments within its setting which could harm the ability to appreciate its domestic scale and semi-rural character.*' The document also notes as a problem and pressure the '*tall developments outside the borough / across the River Thames, impacting on the setting of the Conservation Area, and listed buildings and other heritage assets within it.*'
- Paragraphs 9.89 - 9.94 of the Environmental Statement Vol. II: Built Heritage, Townscape and Visual Impact Assessment Addendum conclude that the impact of the proposed development on the significance of listed buildings on Kew Green would be 'very low'. Paragraphs 9.164 - 9.168 concludes that there would be no impact on the Kew Green Conservation Area. The principal reason for these conclusions is the distance between the proposed development and the heritage assets.

- Evidently there would be an impact on these heritage assets as the proposed development would be visible from Kew Green and listed buildings. As the development would be located approximately 650m from Kew Green it would not be distant, but quite prominent given its height. The development would be very noticeable behind the listed buildings from Kew Green and would represent a noticeable level of ‘less than substantial harm’ to the setting of these heritage assets.
- The proposals would have a similar impact on Kew Green as on the World Heritage Site, intruding on the skyline in views northward from and across Kew Green. The proposed development would be visible in between and above the buildings on the north side of the Green which are mostly 3 or 4 storeys. However, because there are longer views across Kew Green and less planting compared to Kew Gardens, the proposed development would be more prominent and have a more harmful effect. The proposed development, cumulatively with other development nearby, would further create an urbanising effect contrary to the ‘semi-rural’ character of the area as set out in the Conservation Area Appraisal.
- It is clear that the proposed development would contribute to the ongoing issue of tall buildings negatively impacting the setting of the Kew Green Conservation Area and the adjacent listed buildings. The reduction in height of the revised scheme is not thought to be sufficient to mitigate the harmful impact.

3. River Thames

- *Chiswick Bridge*
 - The view from Chiswick Bridge west along the river is designated as Local View (H1.1) in the LBRuT Draft SPD on Local Views. It is also shown in AVR05 of the Environmental Statement Vol. II. This stretch of the Thames is characterised as ‘Arcadian’ in the Thames Landscape Strategy and in Richmond Local Plan Policy 18. The proposed development would be visible in the distance from Chiswick Bridge and would contribute to an increased urbanisation of view. In this case, the distance is significant, reducing the level of harm to the view and local character.
- *Brentford Gate*
 - The proposed development would also be visible in the view from Brentford Gate (AVR A01) along the river to the northeast. Similarly, the development would ‘solidify’ the urban view, helping to create the impression of a wall of development and detract from the river landscape.

Contaminated Land

This site is beyond the boundary of LBRuT and, therefore, there are no objections in relation to environmental health stemming from contaminated land.

Air Quality

Several locations in LBRuT have been identified as having vulnerable road users in the Outline Construction Logistics Plan (4.2.9). It is presumed that, as the South Circular (A205) has been identified as a route into the site from South and Central London, passing through Kew, Sheen and Barnes, that LBRuT will be a stakeholder and included in relevant discussions on the routing of construction traffic in the future. LBRuT would like to be consulted on any CLP/CMP submitted as a condition which results in vehicles passing through LBRuT.

The LBRuT supports the implementation of FORS Gold standards as part of the scheme which will help reduce the impact on air quality from vehicle movements. Similarly, the Action Plan in Appendix A of the Travel Plan is thought to be robust.

Transport

Highways Impact

Table 1 below (taken from Table 5.18 of the TA) shows the predicted net impact of the proposed development. A low level of development trips is expected based on the low provision of car parking discussed later in this document.

Table 1: Trip generation of proposed development

Mode	AM Peak (08:00-09:00)	PM Peak (17:00-18:00)
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	In	Out	Total	In	Out	Total
Cars / LGV	7	30	38	21	12	34
Motorcycle	5	8	13	6	7	13
LGV	4	4	8	12	12	25
MGV / HGV	0	0	0	2	2	3
Total	14	38	52	40	31	71

In addition, the net impact of the development would result in a decrease of two-way traffic flows, particularly inflows in the AM peak hour and outflows in the PM peak hour shown in Table 2. Therefore, this is unlikely to impact the road network negatively within the LBRuT boundary.

Table 2: Net trip generation of proposed development

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	In	Out	Total	In	Out	Total
Cars / LGV	-84	26	-58	14	-86	-71
Motorcycle	2	8	10	5	3	9
LGV	4	4	8	12	12	25
MGV / HGV	0	0	0	2	2	3
Total	-78	38	-40	33	-68	-35

Public Transport

Trip generation for public transport has been broken down into direction (i.e. north, south, east and west) though this is ambiguous as 'south' appears to simply refer to journeys made along Lionel Road South onwards. Therefore, it is not clear how many of those two-way trips shown would travel across the river because people may simply be travelling to the nearest bus stop to travel onwards in any direction. This is likely to be the case because the nearest bus stops for the 237 and 267 bus routes lie south of the site but neither route crosses Kew Bridge. However, if we assume that all those travelling south do go over the river then the expected increase on bus routes 110 and 65 (combined) to/from LBRUT is shown in Table 3 below (taken from table 5.31 of the TA).

Table 3: Bus trips generated by proposed development south of the site

Direction	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	In	Out	Total	In	Out	Total
South	3	16	19	11	6	17

The site is also close to Gunnersbury underground rail station which connects to Kew Garden and Richmond stations via the district and overground lines. The site is a 1.3 km walk from Gunnersbury Station, according to the TA. Whilst the site is predicted to substantially increase underground trips (which would account for over a quarter of the new development's trip generation), it is estimated in Table 5.33 that a single trip in the two standard peak hours would travel to/from the south. This appears reasonable as both lines terminate at Richmond, and it would be cheaper and potentially quicker to travel by bus to Kew and Richmond.

Car Parking & Overspill

Section 3.7 of the Transport Assessment states that the car parking provision for the development would contain 89 parking spaces, including 30 spaces for those with impaired mobility (28 for residents and 2 for disabled staff working at the Site).

This compares to a parking provision for the current land use of 250 car parking spaces, including six disabled parking spaces.

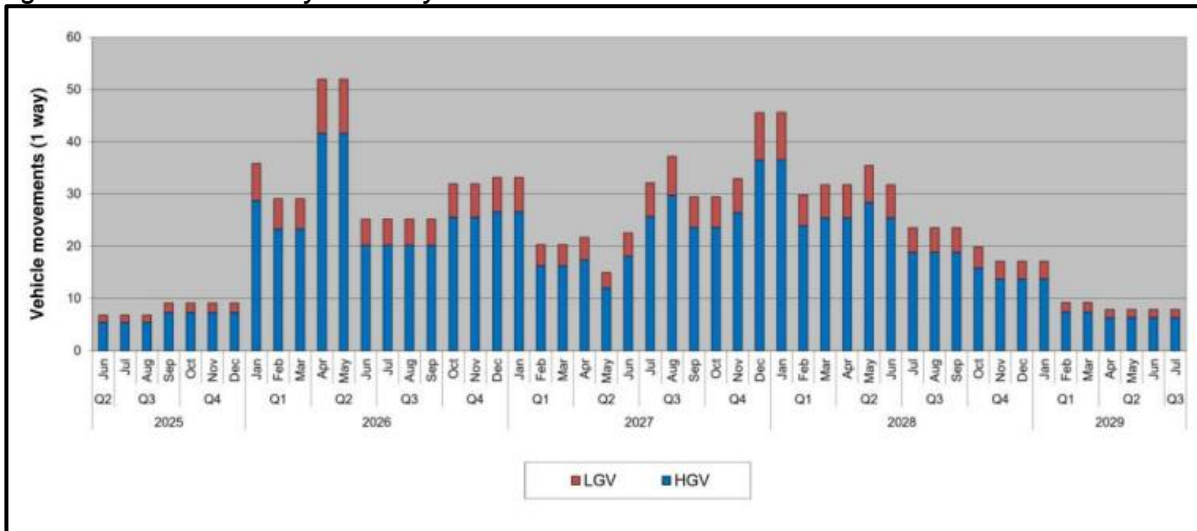
The proposed development is in part for 856 new dwellings, so the restrictions on parking have the propensity to cause overspill parking elsewhere. However, there are a couple of reasons which make it unlikely that anywhere south of the river would be desirable. These are:

1. The site is around a 1km walk from the southern end of Kew Bridge and the closest residential areas within the LBRUT boundary (using current available routes).
2. Virtually all the closest residential areas to the north and east of Kew Gardens operate as Controlled Parking Zones.

Construction Traffic

Chapter 6 of the TA concerns the outline plans for construction. Figure 1 below taken from the TA shows an estimate of the daily one-way construction trips generated. It is noted on Page 86 that construction traffic travelling from south and central London would travel via the South Circular A205. However, the TA also states that most construction traffic would be expected to enter/exit via the M4 Junction 2, so the impact should not be significant on LBRuT roads south of the river.

Figure 1: Estimated daily one-way construction traffic



A Construction Logistics Plan has been published as a standalone document and this does take note of the fact that along parts of the A205 within the LBRuT, high levels of pedestrians and cyclists will be present so extra care and attention will be taken. Construction trips will also be planned to not impact the peak hours along with other measures.

Overall, there are no particular concerns regarding transport and highway matters.

Residential Amenity: In terms of residential amenity, given nature of the proposal and the distance from nearby residential properties (within the Richmond Borough), the proposal is not considered to unduly impact upon the residents within this Borough.

Summary: The London Borough of Richmond raise an objection

The London Borough of Hounslow is to be advised that this Authority (London Borough of Richmond Upon Thames) raises objection to the proposal, resulting from harm caused to heritage assets and townscape within the London Borough of Richmond:

1. The proposed development would harm the setting and Outstanding Universal Value of The Royal Botanical Gardens, Kew, World Heritage Site, particularly, The Great Lawn and views towards the Orangery (AVR11), The Hive (AVR14), and Kew Palace (AVR17), both individually and cumulatively with other nearby development, contrary to the Great West Road Masterplan, the Royal Botanic Gardens, Kew WHS Management Plan and London Plan Policy H2.
2. The proposed development, cumulatively with other development nearby, would further create an urbanising effect contrary to the 'semi-rural' character of the area as set out in the Conservation Area Appraisal representing a noticeable level of 'less than substantial harm' to the setting of the listed buildings and Kew Green Conservation Area heritage assets.
3. The proposed development would contribute to an increased urbanisation of Chiswick Bridge - Local View (H1.1) in the LBRuT Draft SPD on Local Views.
4. The development would 'solidify' the urban view from Brentford Gate (AVR A01), helping to create the impression of a wall of development and detract from the river landscape.

Informative: The LBRuT would like to be consulted on any CLP/CMP submitted.