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Ealing Road, Brentford

BCC 458

BCC Comments on Pre-Application Consultation of May 2009

1 Context

This site is currently wholly commercial but has not been usefully occupied for over fifteen years. During this time it has been the subject of seven previous planning applications, many of which had unrealistic expectations of what could be built here.

Since the most recent application, construction has progressed on the adjacent site of Great West Quarter, the BAAP has been adopted and published, and the economic climate has taken a downturn.

The site specific policy of the BAAP (M1) recommends in summary “Mixed use development providing a range of accommodation, including affordable and family housing. Commercial development should be located fronting the Great West Road, particularly within the NEC D noise contour. Open space and community uses should form part of a mixed use scheme in order to contribute to the overall goal of area regeneration and sustainable living.”

The Borough’s Employment Development Plan does not reserve the site for employment use, nor is not described as a Key Office Location, because of its relatively poor transport links.

The London Plan has been revised to demand less affordable housing, but to require that more than 30% of housing units be for family accommodation.

2 Economic

Continued sole commercial use for the site would not be valid. A mixed use with some residential element is therefore accepted. However this is an important employment site in the BAAP, so this site should retain much employment generating floor space.

The change of use to a mix of 50% commercial and 50% residential floorspace is in accord with our comments on previous applications, and with the BAAP.

We welcome the absence of retail floor space. Local needs will be met by that currently being built at GWQ, while any “destination” type retail use would be likely to fail or to compete with that of Brentford high Street.

In general, the replacement employment seems appropriate, although the amount of hotel space should be subject to assessment. There is currently good demand for hotel space, but this could change with the hotels at GWQ and Syon House under

construction, and the hotel at Gillette corner in planning.

The office provision should be in small units which are more likely to let quickly and are more likely to provide employment to local people.

3 Social

The sum effect of this application combined with the nearby schemes at Wallis House and Thames Valley University would be to add about 3,000 residents in an area where the infrastructure has yet to catch up with the existing development.

We understand that there is currently no user for the proposed care home. The recent assessment of Primary Health Care in the area has identified the need for a new doctor's surgery, and the location of this is currently under consultation. The PCT should be approached to see if that building would be suitable, although it is not far from the existing health centre in Boston Manor Road.

The pressure on the limited development land to provide education sites is increasing, and the need for additional primary school places in Brentford has already been identified by the borough. An alternative use for this part of this site could be for education, but the Council has to decide whether this is an appropriate site, whether it would be large enough, and whether the LEA can fund the land purchase.

The proportion of affordable housing in this scheme seems to be in line with the revised targets of the Mayor, and recent permissions granted in the area. The number of family units within this provision is welcome. The architectural treatment of the private and affordable sections of housing appear to be similar and we assume that the design will be "tenure blind".

We also welcome the provision of private family housing, which will go some way to redress the balance of accommodation after the preponderance of flatted development built in the area recently.

We note however that a large part of the family accommodation is in the form of ground floor maisonettes with private patio gardens. In such arrangements, the usability of these private amenity spaces is paramount, and we are concerned that too little attention has been paid to space, sunlight and privacy here.

4 Density

Density is not a primary planning criteria, but it is a useful guide as to the likelihood of problems with amenity space, transport, daylight, and privacy.

With a mixed use site, we favour the use of plot ratios on the whole built floor area. The plot ration for this scheme would be about 2.2. For comparison, that recommended in the UDP for a Town Centre site (which this is not) would be 2.0, that of the GSK building is 1.4, and that of the adjacent GWQ scheme is about 1.9.

The calculated density shows that care must be taken to ensure that the area of amenity space; the privacy of the residential windows and gardens; and the daylight to the residential windows; are all that they should be.

5 Townscape and Built Form

These proposals would keep the structure of the existing tower, but re clad it and change its use. This tower is not an asset to the existing townscape and we would prefer that it be removed.

We have long asked for an explicit policy on high buildings in Brentford, but unfortunately the BAAP does not provide this. However the location of this tower is unfortunate, falling well outside the two existing groupings of; those around the junction of Boston Manor road and the Great West Road; and the Green Dragon Lane flats. Neither does it have the prominence or architectural distinctiveness which could be argued (although not by us) to justify the proposed adjacent tower of the GWQ scheme. Indeed, in bulk and location they each detract from the other.

It does however have the advantage of being familiar. There is also the environmental advantage of reusing the existing R.C. Frame. It would be possible to demolish upper floors to reduce the bulk of the building to something more fitting to its location, while keeping the lower structure. If it is to be retained, it will be a prominent landmark and care must be taken in its architectural treatment.

We note that the three buildings on the northern boundary are separate, rather than being joined as a wall, which keeps them in scale with other nearby buildings.

We welcome the space that the scheme offers to the public domain on the street frontages. In particular, this space is essential to mitigate its impact on the A4 and the pedestrian and cycle routes along its edge, which are more open to both east and west of this site.

The set back of the building lines of the east and west elevations is also welcome, as is the consideration of the scale of adjacent two storied terraced housing.

The architecture and materials are unashamedly modern which is appropriate given the location and form of the development. We reserve our views about the architectural relationships and the suitability of the buildings in their context until there is more detail.

6 Amenity

The internal courtyards are welcome, but will lose some of their value by reason of the height of the adjacent building on three sides of each courtyard. Removing the return 'wings' of the southern ends of the residential blocks would improve the amenity value of these spaces.

The planting scheme is not yet available, but we would ask for extensive areas with grass, flower beds and groups of trees, particularly where there is solid ground rather than car park roof. The aim should be to suggest a natural planted background onto which hard paths and buildings have been introduced, rather than an urban courtyard.

We are concerned about the private patio gardens of the ground floor maisonettes. Some of these are currently very overlooked and are located in North or East facing corners with little sunlight.

The number of children in the development could approach 100, and explicit

appropriately furnished play space must be provided.

No figures were provided for the area of amenity space, but in a scheme aspiring to house this many children, it is essential that the standards in both minimum area and in quality are upheld. The south facing flat roofs of the residential blocks are presumed to be amenity spaces, and at least some of these should be for communal use.

We understand that the courtyards are to be shared private spaces, which has worked well in other developments in the area.

We welcome the number of balconies, and that most of these have partial south orientation.

7 *Transport and Parking*

The site has currently a PTAL value of 2 and 3, which is low to medium public transport accessibility level. Proposed improvements to the 235 and H91 bus routes (to be implemented with the GWQ scheme) will improve this to a PTAL of 3 in the entire site.

The East/West pedestrian / cycle thoroughfare is welcome, along with the link with the public access through the GWQ scheme. The provision of cycle parking is not shown on these drawings but we assume that there will be at least 1 space per unit.

The proposed separation of utility vehicles from residential vehicles appears to be well thought out, but the arrangements for domestic waste removal and recycling are unclear. Noise from this activity at ground level within courtyards would be a problem to the residents.

It accepted that the increase in car journeys would not have a noticeable affect on local roads. The increase in bus passenger traffic could be met by increasing bus frequency, which could be secured by Section 106 contribution.

8 *Air Quality*

The site suffers low air quality because of the adjacent M4. Annual average and daily average NO₂ and PM₁₀ concentrations will exceed future objectives.

The built form of the scheme will to some extent protect the residential windows facing the courtyard. We presume that the hotel and commercial buildings will have fixed windows with air conditioning.

9 *Noise*

The site suffers high noise pollution because of the adjacent M4. Predicted noise levels are Category C & D ("should be refused") [PPG24 Annex 1].

We note that the gaps between the buildings on the North side align with the northern ends of the residential blocks, so that there is still no direct line of sight from the internal courtyards to the A4, which is important for sound reduction.

There are no windows shown in these northern faces. Should any be used, they will require enhanced sound proofing to protect the residents.

We suggest using rubber-crumb aggregate replacement in the concrete walls facing the motorway, to help absorb sound and vibration. This would reduce noise reflection which will otherwise make the A4 and its edges even less pleasant.

In addition we suggest acoustic fencing be erected along the elevated section of the M4 to provide some screening, and that the mitigation measures should be designed to achieve "internal noise levels to BS8233.

We presume that the hotel and commercial buildings will have fixed windows with air conditioning.

10 Daylight

It is accepted that the proposal does not have a major impact on daylight of existing adjacent houses.

On a cursory inspection, those residential windows in the corners of the courtyards at ground floor level may not get enough daylight. A daylight assessment must be carried out by the applicant, to show that these windows will receive adequate daylight according to BRE guidance.

We are concerned that the east facing private patio gardens of the ground floor maisonettes within the courtyards may not get enough sunlight to be useful.

11 Conclusion

The work done in preparing this scheme is generally welcomed. We presume that on aspects not addressed such as environmental sustainability, the scheme will meet the BAAP.

We also have some concerns which we would like to see addressed before the application is lodged.:

1. That the provision of so much hotel floor space can be justified when the other schemes in the area are taken into account
2. That the additional load on local school and health services requirements can be met on suitable sites. This may require dedicating part of this site for a school and/or health facilities. We consider that this should be clearly resolved before the application design is taken further.

It would also be desirable to determine whether a surgery or an education use may be more beneficial to the area than a care home..

3. That the patio gardens for the maisonettes units will be substandard
4. That certain residential windows will have inadequate light
5. That the present tower structure should be reduced in height, and that its appearance must reflect its important location and the context of the other buildings proposed.