

Mrs M.T. Scott  
The Planning Inspectorate  
Room 4/04 Temple Quay House  
2 The Square, Temple Quay  
Bristol BS1 6PN.

BCC 428 dmb

November 6<sup>th</sup> 2008

Dear Mrs Scott,

### **Town and Country Planning Act (Control of Advertisements) (England) Regulations 2007.**

Land at the New England Bar	Ref: APP/F5540/H/08/2082767
Land Adjacent to Vantage West.	Ref APP/F5540/H/08/ 2084929.
Sunleys Island	Ref 2084927
Former Performance Cars site	Ref 2084926
West Gate Petrol Station	Ref 2084932

***The Brentford Community Council wishes to support the refusal of these applications by the London Borough of Hounslow and requests the inspector to uphold these refusals.***

#### **1.00. The Brentford Community Council.**

- 1.01. The Brentford Community Council was originally set up by the London Borough of Hounslow in 1989 as part of a programme to establish Community Councils throughout the borough.
- 1.02. The Brentford Community Council continued as an independent organisation when the original Council support was withdrawn and is now a non-political, self-financed organisation of street groups and individual members living or working within the Brentford area of Hounslow.
- 1.03. The Planning Consultative Committee of the Brentford Community Council (BCC) meets regularly throughout the year and sends its views to the officers of the borough Planning Department. These cover all major applications, all applications within local Conservation Areas and all policy documents with an impact on Brentford.

- 1.04. The BCC has appeared as a Rule 6 party in the PLIs into the recent applications for developments at Kew Bridge, Commerce Road, Albany House and Brentford Town Centre (BAAP). Additionally the BCC has given evidence at the Heathrow Terminal 4 and Terminal 5 inquiries and into successive inquiries into the borough's UDPs. Page 1
- 1.05. The BCC has provided views quoted in officers@ reports on the New England Bar, Wallis House and Alfa Laval applications.

## **2.0. The Approach of the Brentford Community Council to Development on the A4/M4 corridor.**

- 2.01 In accordance with Council policy the BCC endorses the importance of the Golden Mile as a centre of employment and mixed use development. We regret that sites on the Golden Mile have not been viable as solely office development, due partly to the absence of high quality public transport to many of the development sites identified in the UDP.
- 2.02. The Council's decision to grant planning consent for the Wallis House site for mixed use development has increased the importance of the A4/M4 corridor as a residential area even though it abuts the A4 and the M4 viaduct.

This scheme alone adds over 750 families to this A4 frontage site.

Further applications for office, residential and hotel uses are in the pipeline for the Alfa Laval site and for the former Gillette site to the west.

- 2.03. The applications for advertisements on the A4 /M4 corridor therefore have to be evaluated as they affect:

Those already working and living in the area.  
New residents and workers being attracted to the area.  
Passing motorists.

- 2.04. The BCC has long resisted new development which is out of scale with the residential area of Brentford. We have now accepted that earlier decisions to allow high rise office development at the A4/Boston Manor Road junction has led to a cluster of high buildings.
- 2.05. Similarly the high rise Council flats to the south of the A4 have given some credence to the high buildings included in the Wallis House Development.

2.06. Never the less the dominant scale of domestic buildings remains 2 and 3 floor terrace housing and this scale and character remain the environment in which most Brentford residents live.

Any new proposals should preserve and respect this existing residential character.

**2.07. The BCC considers that the impact of advertisements on the A4/M4 corridor is inimitable to the existing residential character of the area and unsuitable on sites which are close to existing residential areas.**

2.08. We also consider that the proposed advertisements devalue the environmental quality which the developers of new residential sites on the A4 are trying to create.

2.09. If they detract in any way from the desirability of these sites they will make it more likely that the new flats will remain empty. The recent down turn in the housing market only emphasizes the competitive nature of residential development on difficult sites.

2.10. If new families do come to these sites they will add to the residential population living in an area debased by excessive advertisements.

**2.11. The BCC believes that the proliferation of advertisement sites on the A4/M4 corridor devalues the environment and is detrimental to the policy of using these mixed development sites for substantial residential development in accordance with the policies in the London Plan the UDP and the BAAP.**

2.12. We reject the view that advertisements are suitable on these sites because the M4 carries through traffic.

**2.13. We believe that, if the inspector is minded to support advertisements on the M4/A4 frontages (despite the views on road safety set out in the Hounslow proofs) they should be confined to sites which are not also in residential areas.**

**3.0. These views apply to all the advertisements referred to. Individual comments on each application should be read with them.**

- 1.01. The history and description of this site are set out on pages 2/7 of the "Statement" submitted by the London Borough of Hounslow.
- 1.02. The Statement shows that this site has been the subject of several applications to redevelop it as a hotel. The BCC has objected to those applications which are out of keeping with the character of the existing building and its residential environment.
- 1.03. The present advertisement (see Statement, paras 4/4.6) is grossly out of scale with the present building, the approved planning application proposals and the surrounding buildings.
- 1.04. We believe that its size and design derive solely from the desire for visibility from the M4 viaduct.
- 1.05. We understand that the advertisement attracts a substantial revenue which could be greater and more secure than that which could be obtained if the site were developed to the approved planning consent.
- 1.06. The advertisement is therefore acting a blight on development.
- 1.07. If consent were granted to allow the advertisement to continue or if enforcement action failed the efforts of the borough to secure the redevelopment of the area in accordance with the London Plan and the UDP would be thwarted.
- 1.08. We request the inspector to refuse this application and to urge the Council and TfL to clarify policies restricting advertisements in this area so as to encourage the early completion of approved applications for employment and residential redevelopment.**

- 1.01. The description and history of this application are set out in paras 1/3 of the "Statement" submitted by the London Borough of Hounslow.
- 1.02. Para 5.3 of the statement refers to the long held view of the BCC.
- 1.03. This application has to be considered in the context of the approved application for high rise development on the adjacent former National Westminster Bank site.
- 1.04. It is understood that a "start" has been technically made on this scheme to ensure that the application does not run out of time. It must therefore be considered as a development which will, in time be built.
- 1.05. However, developments on this site have encountered opposition from the Borough, from inspectors and even when a planning consent has been granted, from developers and their funding partners.
- 1.06. Although the BCC did not support the approved development design we consider that approved developments should not be frustrated by rogue applications. We therefore support the Council's efforts to remove this advertisement for which there is no consent.
- 1.07. *We also consider that consent should now be refused so that there is no advertisement on this site until the approved development is completed; at which time it should be possible to consider whether any advertisements on this site would suitably compliment the approved design.***

- 1.01. The description and history of this site are set out in paras 1/3.1 of the "Statement" submitted by the London Borough of Hounslow.
- 1.02. Para 5.3 indicates the long standing opposition to advertisements on this site.
- 1.03. Applications for low rise eccentrically designed buildings have been submitted to the Council. The BCC has objected to these proposals as being unsuitable for their context.
- 1.04. In our view the site should not be developed nor used for advertising.
- 1.05. Gunnersbury Park would be adversely affected by the application. The park is the historic estate of Gunnersbury House (listed) which has been in the care of Hounslow and Ealing councils. After a long period of partial neglect the two Councils are making plans and seeking funding to restore the two historic houses and the grounds.
- 1.06. No proposals which could prejudice the historic and amenity value of Gunnersbury Park or its surroundings should be accepted.
- 1.07. Recent changes to the A4 include pedestrian crossing points giving safe access for residents living south of the A4 to Gunnerbury Park. The planning consent for the Wallis House site (now under construction) increases the residential population in this area by about 1,900 people (755 flats x 2.5).
- 1.08. *Gunnersbury Park is the nearest large open space. The plans that Hounslow and Ealing have to improve the park should be supported. No development or advertisements near the park including the Sunley Island site should be permitted.***

- 1.01. The history and description of the site are set out in paras 2/3.1 of the "Statement" submitted by the London Borough of Hounslow.
- 1.02. Para 5.3 records the views of the BCC.
- 1.03. Despite the group of high buildings at the A4/Boston Manor Road junction) (see pp 2/3 above) the character of Windmill Road north of the A4 has remained domestic. The predominant scale is 2/3 floor terrace housing.
- 1.04. The Council recently granted planning consent for 4 floor flats on the West side of Windmill Road close to this site. The BCC argued that the height should be limited and that the articulation of the Windmill Road elevation should reflect the intimate scale of the existing development.
- 1.05. Amendments were made to the original scheme to partially achieve this result. The scheme is now under construction.
- 1.06. This decision shows the Council's resolve to respect the residential character of the area even where the pressure for new housing is felt.
- 1.07. ***The BCC consider that this advertisement is out of scale and character with this area. It is an area where real efforts are being made to preserve the residential character and scale. The application should be refused.***

1.01. The description and history of the site are set out in paras 1.0/2.1 of the "Statement" submitted by the London Borough of Hounslow.

1.02 Para 4.3 indicates the BCC views.

1.03 para 2.2 refers to the advertisement structure over the Alfa Laval building. The BCC consider that unauthorised advertisements which have not been removed and those which are currently subject to appeal in this area together form a blight on appropriate approved developments and tend to down grade the environment.

We are pleased to note that the inspector considered the Alfa Laval advertisement to be harmful to both the amenity of the area and to public safety.

**1.04 *The BCC urges the inspector to endorse this view in respect to this application and to reject it.***

## **Summary and Conclusions.**

The BCC requests that the general observations set on pages 1/3 of this letter should be read with each of the pages which refer to single applications.

### ***We ask that the inspector rejects all of the applications and***

1. That the Council takes swift enforcement action to remove these unacceptable advertisements.
2. Adopts with TfL stricter and more precise policies to limit the impact of advertisement in this mixed commercial and residential area.
3. Encourages the completion and approved development schemes and the positive regeneration of the area.

Yours sincerely

Denis M Browne  
Chairman, Planning Consultative Committee  
BCC..

