

Brentford Town Centre Regeneration

Initial joint feedback of Brentford High Street Steering Group, Brentford Chamber of Commerce and Brentford Community Council

18 November 2011

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1.0 Context

The High Street Steering Group, The Brentford Chamber of Commerce and the Brentford Community Council held a joint meeting with Ballymore, their design teams and with Soundings at the outset of this consultation.

Since then the three organisations have shared views on the emerging designs for our town centre.

We have welcomed the work Soundings have done to engage Stakeholders through the Community and Residents Reference Group (CRRG) and to present the design team's initial ideas through an exhibition.

We have in different ways been closely involved in thinking about how our town centre can be brought back to life and we have therefore prepared some informal and preliminary comments from a rapidly convened working group. Broadly we feel the architectural language and amount of retained historical features is promising, as well as the desire on the part of the developer to embrace Brentford's "uniqueness". We continue to have the highest expectations of some of the UK's top designers as the scheme development moves forward.

2.0 High Street, retail & trade, including access highways and parking

2.1 Summary

2.1.1 Traffic

Capacity constraints on the road network and Council planning guidance means that the development should seek to be as car free as possible. The case has yet to be made clear as to the level of

additional shopper movements, other than by the residents of the development, with which the town centre can cope.

2.1.2 Bus Facilities

Early consideration should be given to the locations and design of bus stops and stands that are recessed back from the roadway so that they do not obstruct through traffic. The capacity of these stops should anticipate an increase in frequency on the key bus routes in order to cope with additional residents and a potential new school.

2.1.3 Cycle Facilities

Given its proximity to the canal towpath and other cycle routes, special efforts should be made to incorporate facilities that will encourage surrounding residents to visit the town centre by cycle. Given accelerated growth in cycle traffic, planning for this needs to be an early and specific consideration.

2.1.4 Integration with the Town Centre

An updated spatial strategy should be prepared to evidence how the development will integrate with the rest of the town centre and thereby potentially act as a catalyst for the regeneration of the wider town centre.

2.1.5 Permeability & Circulation within the Development

Resident and visitor footfall, circulation and movement within the development needs to be identified and modelled, along with vehicle movements. Where are the desire lines for pedestrians (visitors and residents) and vehicles? Where will these be in conflict?

2.1.6 Visitors

The visitor spend will be essential for the viability of the trading activities within the development. Every effort should be made to finesse the design so that a visitor to the town centre is visually encouraged to enter and explore the development.

2.1.7 Reinstatement of a Key Sight Line

Options should be explored to maintain a key sight line and linking yard proposed in the Prince's Foundation for the Built Environment Report, running from the centre of Market/Magistrates Court Square to the centre of Workhouse/JMW Turner Basin should be reinstated (Ridgeway's Yard). This connects with the focal point of the High Street and forms a southern continuation of the route from the northern side of the town centre and the Butts. We recognise the value of Bradbury's Yard and Boars Head Yard, but would like to see the option explored of losing Plough Yard in favour of Ridgeway's yard.

2.1.8 Medium sized quality food store

The position of the quality food store would need to be adjusted so that the key sight line referred to in 2.1.7 above could be reinstated.

Given the pressures on the local highway network, see 2.1.1 above, and in order to maximise the pedestrian nature of the development, shopper car parking for the food store customers needs to be clearly justified. Will this car park service the needs of all visitors to the west end of High Street, given the loss of the Clitherow Yard car park?

Car parking will be needed by elderly, disabled, families with younger children, etc. The development has to cater for all potential visitors. Perhaps discounted parking for 'qualifying' cars and full price for others?

There is a view that the High Street and its entry points are already operating at a high capacity. There needs to be an early assessment as to how much extra capacity it can cope with and if any through traffic can be diverted to other east-west routes.

Special efforts should be made to minimise the disruption caused by the movement of delivery vehicles servicing the food store. A servicing plan with restrictions will be required.

2.1.9 "Main" versus "Top-Up" Food Shops

Council market research identifies two distinct types of food and grocery shopping.

- Firstly, the "Main" weekly shop, which is overwhelmingly bulky and therefore dependent on shoppers who travel by car.
- Secondly, the more frequent "Top-Up" shops, which are far less car dependent with the majority of customers walking to the store.

Whilst these may represent extremes, and there is also a shopping style that falls in the middle, different types of food outlet lead to different intensities of car borne shopping. The former relies on a larger store with car parking, more delivery movements and generates substantial pressures on the surrounding road network. In order to minimise these pressures new "Main" shop supermarkets are often located at the edge of a town centre.

"Top-Up" stores are often referred to as Convenience Stores and are being rolled out by the major retailers in locations where they will attract the maximum number of commuters as they walk from transport hubs to their homes or offices.

It is particularly important to consider that carers of young children or elderly people may of course still need to drive to the shops, even for a 'top up' shop.

2.1.10 Concept of an “Anchor”

The purpose of an “anchor” store or cultural/leisure activity is to entice visitors into an area as part of a multi-purpose visit.

The aim is for the visitor to spend some time at the anchor and also visit and spend money with the surrounding retail and leisure outlets. Traditionally department stores have been cited as examples of an anchor. In the case of Uxbridge the Debenhams has been teamed up with a multi-screen cinema.

A medium sized food store catering for a mix of “top ups” and the “Main” weekly food and grocery shop may fail to work as an anchor as the overwhelming majority of visitors may only be interested in purchasing their food and then walking, cycling or driving home as soon as they have completed this.

It is possible that Brentford needs to consider an extended “anchor” concept that is the sum of a number of adjoining retail and leisure outlets that are based on the underlying theme of the town’s heritage, location and built environment.

We need to maximise the incentive for shoppers to the town centre, and in particular the existing anchors such as Morrisons and future anchors, to venture further into the High Street and to purchase from other other retailers and services. One or two well designed ‘anchor’ stores will help draw people in to the niche artisan shops that are proposed.

2.1.11 Retail

There needs to be greater clarification of all aspects of the proposed retail and small business units component of the development. Live work units aimed at families would be highly desirable.

2.1.12 Catchment Area

The catchment area for the proposed trading activities needs to be rapidly identified and assessed in order to test the viability of the activities.

The catchment area will depend on the retailer offer and how it appeals to residents of Brentford and the surrounding area.

Development of different retail scenarios would aid discussion and inform final retail, business and parking plan.

2.2 Background

2.2.1 Brentford as a Town Centre

Key planning policy

Developments in Brentford Town Centre will be guided by three key planning documents:

- London Plan 2011
- Draft LDF Core Strategy 2011
- Brentford Area Action Plan 2009 (BAAP)

Additional reference points

We also expect them to be informed particularly by the work of the Community Vision (2007), as well as the Prince's Foundation for the Built Environment workshop report (2010).

2.2.2 London Plan 2011

The London Plan defines Brentford as a District Centre with only Medium Growth potential. District centres are identified as servicing local communities and as being accessible by "public transport, walking and cycling."

The Plan also states that the definition of Medium Growth means that growth should only be undertaken if there is the "physical and public transport capacity to accommodate it."

2.2.3 Hounslow's draft LDF Core Strategy 2011

The Council's aspirations for Brentford Town Centre are set out in paragraph S.1.4 on page 15. This includes the statement:

"Continue the approach to town centre regeneration set out in the Brentford Area Action Plan. An increase in town centre floorspace will be promoted by the council in order to enhance its retail, social and community role in a manner that reflects its role as a relatively small District centre. Growth should take place within a consolidated town centre that captures the distinctiveness of Brentford's unique waterside character. A diverse range of uses should be provided which are accessible to all."

2.2.4 Brentford Area Action Plan 2009

Paragraph 6.8 of the BAAP sets out the wish to see additional retail and leisure floorspace within the town centre and that this should be focused on the existing High Street in order to provide a strong retail core. It states:

"The enhanced retail offer together with some supporting leisure, business and residential uses will increase the attraction of the centre for surrounding residents by improving access to a range of services and reducing the need to travel."

It also states that a permanent site should be provided for a farmers

market.

2.2.5 Transport Constraints

Pressures on the local road network may represent a major constraint on any development in Brentford Town Centre.

The A315 Brentford High Street is already operating at near capacity. This is exacerbated by the bottlenecks or “throats” at each end of the town centre that result from the road’s narrowing beside the Beehive Pub/Morrison’s and at the bridge over the canal next to Commerce Road.

With low PTAL figures a potential increase in traffic of 75% (on peak) and 50% (off peak) is of concern.

We are conscious that there presently appears to be significant through traffic along Brentford High Street that does not necessary increase levels of trade – people just pass on through. It is possible that if congestion (due to development) increases on the High Street that drivers will start to use the A4 route instead of the High Street freeing up capacity. The risk is that congestion could be a deterrent to visitors coming to the High Street by any mode of transport, thereby damaging its economic viability.

Further improvements to vehicle signage would be highly desirable, e.g. ‘Brentford Town Centre Only’ signs and live information on the parking spaces available at entry points to the town.

2.2.6 The Council has stated:

“Development proposals will not be supported where they have an unacceptable impact on the capacity of the highway network.”
Draft LDF Core Strategy 2011, paragraph INF.1.1, page 54

“An assessment of transport capacity on Brentford High Street showed that significant increases in traffic are likely to be unacceptable with a number of junctions at capacity and experiencing significant congestion. In accordance with the recommendations of the transport assessment the scale of retail development envisaged is limited to be compatible with a local catchment appropriate to Brentford’s District centre status. All new developments within the town centre will contribute to improvements to sustainable access including increasing the frequency of the E8¹ bus service, improving cycle and pedestrian links, and promoting management measures such as car free development on major town centre regeneration sites.”
BAAP 2009, paragraph 6.10, page 26

¹ Since the BAAP was published the frequency of the off-peak E2 bus service has been reduced by between 25% and 30%. This reduction was associated with TfL’s switch from single to double deck buses on this route.

2.2.7 Traffic congestion along the A315 High Street can be expected to increase due to the nearby housing developments at:

- Commerce Road – ISIS
- Albany House and Goat Wharf – Barratt
- Thames Water – St James, phases 1 & 2
- Kew Bridge – St George, phases 1 & 2

2.3 The Relationship between Mode of Travel and Retail

The following forms of retail are highly dependent on car-born shoppers:

- The main weekly food shop, and
- Higher value comparison goods.

2.3.1 Main Weekly Food Shop

Market research commissioned by Hounslow, Ealing and Hammersmith & Fulham Councils in 2006 and repeated in late 2009 identifies the methods by which residents travel to their main and top-up weekly food shops.

The results for residents in the Brentford survey zone and the total survey area are shown below.

In the case of the main weekly food shop 66 percent of Brentford residents travelled by car in November 2009 compared to 62 percent across the wider survey area.

When it comes to the second, or top-up, weekly shop only 27 percent of Brentford residents travelled by car with 52 percent walking.

The implications of this research is that supermarkets that cater for the main weekly food shop will need to accommodate for car-born shoppers with the associated pressures on the road network and parking provision, while smaller convenience orientated food stores can minimise, or eliminate, these pressures by focusing on top-up customers who travelled on foot, by cycle or bus.

Mode of Travel to <u>MAIN</u> Weekly Food Shop				
	Zone 16 - Brentford		Total Survey Area	
	September 2006	November 2009	September 2006	November 2009
Car	62%	66%	64%	62%
Bus	17%	20%	11%	13%
Walk	17%	12%	21%	21%
Source:	Q 2, Page 16	Q 3, Page 413	Q 2, Page 16	Q 3, Page 413

Mode of Travel to TOP-UP Weekly Food Shop				
	Zone 16 - Brentford		Total Survey Area	
	September 2006	November 2009	September 2006	November 2009
Car	42%	27%	32%	27%
Bus	13%	14%	8%	9%
Walk	40%	52%	54%	58%
Source:	Q 6, Page 19	Q 9, Page 428	Q 6, Page 19	Q 9, Page 428

Source: West London Retail Needs Survey 2006 and West London Retail Needs Survey Update 2010

2.3.3 Mode of Travel and Spend

TfL has commissioned research into the relative spending power of shoppers according to the different methods by which they travel to town centres.

The key conclusions of this research are:

- Travellers on foot, making frequent visits, will generate more spending power in a year than travellers who arrive by car, however
- Travellers by car spend more each visit, but make fewer visits than walkers.
- Annual spend by bus travellers is similar in total to those who travel by car but consists of a greater number of lower spending visits.

A very summarised conclusion is that town centres that wish to attract purchasers of high ticket items have to be accessible by car and provide substantial car parking.

An alternative strategy is to develop a more localised offer that is designed to attract frequent repeat visits by shoppers who can travel on foot, by bicycle or bus.

All types of shopper need to be encouraged. The emphasis should be on walkers and shoppers – so better walking and cycling routes, more cycle racks etc.

This could be particularly attractive to town centres experiencing traffic congestion and a shortage of car parking provision.

The full report is titled: Town Centres Survey 2003-4 by Accent Marketing Research. An update report was published by TfL in September 2011.

2.3.4 Food Shopping and Other Purchases

The 2006 and 2009 West London Retail Needs Surveys also asked respondents if they visited any other shops during their weekly main food and grocery shopping trip.

The results for residents in the Brentford survey zone and the total survey area are shown below.

Other shops visited during weekly MAIN food shop				
	Zone 16 - Brentford		Total Survey Area	
	September 2006	November 2009	September 2006	November 2009
None	68%	68%	68%	69%
Other Food	3%	17%	6%	16%
Other Non- Food	17%	18%	14%	17%
Source:	Q 4, Page 9	Q 2, Page 413	Q 4, Page 9	Q 2, Page 413

Source: West London Retail Needs Survey 2006 and West London Retail Needs Survey Update 2010

The consistency of the 68 or 69 percent of shoppers who say that they do not undertake any other form of shopping or activity during their weekly main food and grocery shop indicates that supermarkets which cater for the weekly main food shop provide little if any business for nearby retailers.

An “anchor” value of a medium sized food and grocery that seeks to be of too large a size and only catered for the weekly main food shop would therefore be questionable.

The whole purpose of an “anchor” store is to attract shoppers to a location in order to encourage them to also visit and spend at a number of nearby retailers and leisure outlets. Access on more than one side of the building will be essential in this regard.

2.3.5 Comparison (Non-Food) Shopping

The 2006 and 2009 West London Retail Surveys confirm the perception that Brentford only retains a small proportion of the comparison (i.e. non-food) expenditure of its residents.

The accessibility of nearby larger retail centres (Hounslow, Ealing and Richmond) means that irreversible shopping patterns have become established. In addition, the Westfield White City shopping centre is on a direct bus route.

An added factor is that many of the higher earning residents work outside Brentford and therefore have the opportunity to shop either near their place of work or on their commute to and from work. This trend is likely to be replicated by the residents of the new housing developments.

The critical mass and growth aspirations of these competing nearby metropolitan and major town centres means that Brentford would be unwise to attempt to compete with them directly. The town is unlikely to win this kind of “arms race”.

Instead Brentford needs to develop a more unique retail, cultural and leisure offer that will appeal to the residents of the surrounding area and which they can access on foot, by cycle or bus.

Brentford is an extremely diverse community. This demands a good range of retail offer that caters for the whole community. How this mix is successfully achieved needs careful research and we have suggested a scenarios approach.

2.4 What must “go right”

2.4.1 The Ballymore development could be a catalyst for the regeneration of the wider town centre and the surrounding area. Alternatively, it could prevent or inhibit future regeneration.

The purpose of this section is to identify those issues that need to be resolved at this formative stage in the project.

2.4.2 Integration of the Development with the Town Centre – Spatial Strategy

It is essential that the development is based on a spatial plan or vision that embraces the whole town centre. The current proposals are restricted to the development site and fail to show how the evolving proposals will integrate with the surrounding townscape, businesses and activities across the remainder of the town centre.

The report prepared by the Prince’s Foundation for the Built Environment provides an excellent foundation for this work and

needs to be revisited and used to test acceptability of the emerging designs for the development.

2.4.3 A Built Environment that will appeal to Visitors & Residents

The additional residents on the development site alone will not provide sufficient spend to support the proposed retail and leisure. The viability of these activities will therefore be dependent on attracting visitors from wider Brentford to the town centre.

The town centre and site needs to be visitor friendly and visually accessible through a mix well marked, wider yard entrances and others that are narrower and perhaps more surprising. The potential to include archways at the entrances and glazed roofing to some of the yards should be explored.

The built environment needs to make entering the development as inviting and attractive as possible to the visitor and in particular it should explore the potential to reinstate the route from the centre of the Market/Magistrates Court Square to the centre of the Workhouse Dock/JMW Turner Basin (Ridgeway's Yard). This might see Plough Yard removed from the scheme and would necessitate adjustment to the shape of the proposed supermarket.

2.4.4 Circulation and Uses within the Development

Urgent work needs to be done to model resident, visitor and servicing footfall, circulation and movement within the proposed development. Where are the desire lines for pedestrians (visitors and residents) and vehicles? Where will these be in conflict?

What activities, noise pollution and servicing movements will be associated with the differing proposed uses, and are these acceptable to the adjoining users?

Could the proposed housing along the proposed Clitherow Yard isolate St Lawrence's Church and churchyard from the rest of the development and curtail the success of potential uses? Does losing this housing put more pressure on the three tall blocks in delivering a financially viable scheme? If so, are there other ways of increasing permeability through this row of houses?

Will the ground floor residential frontages be subject to noise and activity from the Yards? Is there anyway in which noise can be minimised through the relocation of residential frontages away from the busier through route Yards?

2.4.5 Defining the Retail and Leisure Offer & Economic Strategy

An economic sustainability strategy is needed that thinks about what is outside the site and includes shops on north side of high street. There needs to be more of a rationale for the location, size and footprint of the proposed retail and related units along the Yard frontages, if a careful balance is to be achieved between independents and multiples. At present the units appear to be small in comparison to the existing town centre retail and business units. Clustering restaurant and café food outlets will give the night time and evening economy (on waterfront or yards?) greater vibrance and viability; and links from Brentford lock to Magistrates Court to the south side of High Street should be carefully considered.

Given the proposed height of some parts of the development, will this be a competitively attractive environment for small businesses? There are vacancies and new builds in the nearby town centres, often with much higher footfall.

Will there be work/live units and workshops? If so, are the developers prepared to release first floor residential space above the ground floor units for this, and will they charge full market price for the residential space?

Will the development provide the base for the farmers market (BAAP paragraph 6.8, page 25) if the aspiration to establish one in Market Place is unsuccessful due to land ownership issues? How will Town Centre Management to support this be established in Brentford longer term?

How Market Place as a location for markets can be maximised should be explored. This might include the potential for a covered market glazing over a section of the space.

2.4.6 Retail Lettings Policy

Will there be a managed lettings policy for the retail and related premises along the lines of that followed by the Howard De Walden estate in Marylebone High Street? If so, what is proposed? - An enlightened rental policy with rent differentials for smaller retailers/ different trades seems vital.

2.4.7 Defining the Catchment Area and its Accessibility

What work has been done to define the catchment area for visitors to the proposed shops, businesses and cultural/leisure activities?

How will these visitors access the site and the town centre (if they live further away)?

What improvements are proposed for the bus network including the installation of additional bus stops (to cope with an increased frequency) which should be recessed into the widened pavements in

order to avoid delaying through traffic?

What arrangements will there be to encourage cyclists, including cycle trailers?

2.4.8 Minimising additional Vehicle Movements

Given the existing high level of road congestion, and the additional traffic from already approved nearby developments, what proposals are there to minimise additional vehicle movements from the retail and related business uses on the development?

One appreciates that residents will need car parking at levels to be agreed with the Council and the Housing SPG of the London Plan.

In view of the concerns expressed by the Council in the draft LDF Core Strategy and the Brentford Area Action Plan, see above, what arrangements will there be to ensure that the proposed quality convenience store will have limited shoppers car parking? Will this service all shops at the Western end of High Street?

By what routes and with what vehicles will the convenience store be serviced?

What arrangements will there be for cyclist shoppers?

2.4.9 Construction Phases

If the development is to be built in stages over a number of years (5 years was mentioned) what is the proposed demolition and construction programme?

Mention has also been made of short term lets of buildings on the site. What is proposed? This needs to be part of the active dialogue with residents and traders to minimise disruption.

3.0 Initial Design Response

3.1 Introduction

This section should be considered alongside the introduction and conclusions and with those comments on Retail Trade and with Water Related issues.

3.2 The Character of the High Street/Central Section

3.2.1 Roadway

The character of the High Street will depend on the quality of the carriageway and pavements and the new uses for which they may be designed. We

understand that to proceed quickly certain assumptions have to be made by Ballymore to allow their plans to develop in parallel. These include:

3.2.2. South Side Pavement

That the 2m wide south side pavement can only be widened to 4m by

- removing south side parking and/or
- narrowing the carriageway or by
- setting back development behind the back edge of pavement
- or moving the carriageway north, reducing the north pavement..

It may be that the north side would actually benefit by having a slightly narrower more urban pavement.

In determining the design for the High Street every measure should be taken to discourage through traffic and to celebrate the centre.

3.2.3. Bus Stops

In addition we expect the bus services in the High Street to increase due to doubling of the local population, restriction on local parking, inclusion of 65 bus route, the provision of additional mini buses which may be required in Brentford/Isleworth if on site parking is restricted.

3.2.4. Keeping Buildings

We are pleased that many buildings are to be retained because of their own intrinsic value and their adaptability to new uses.

We also consider that at least the facades of additional buildings should be kept where they are significant parts of the present High Street character. This includes the façade of the “Docking Station” building which is a four floor brick building. Unlike the low post office and bank buildings it establishes a scale for the whole High Street. Having said that, we also keen to see ideas for new architectural solutions for this section of the frontage and to weigh these up against a façade retention approach.

Exploring the potential restoration of the old Brentford Market façade stored in a yard at Gunnersbury Museum needs attention, perhaps through a ground based reconstruction in a warehouse through the winter.

3.2.5. Demolition of County Parade.

We support the demolition of County Parade, but maintaining the Ridgeways Yard route through the middle, which features in the BAAP site plan. This gives an opportunity to set back the central part of the development to give a focus for the proposed quality food store and the bus stops. It should work with the forecourt of the Magistrates Court opposite, especially if this can become an extension of the north side pavement and possibly the site for an open air markets and for special events.

3.2.6. Re-creating Scale

Before the construction of County Parade the High Street shops were small units of contrasting designs, many having irregular roof lines and first floor bay windows projecting over the street. We think that the new design for this part of the frontage should return to that domestic scale. We would like to see clear party wall divisions, particularly above the ground floor level, varying heights, contrasting materials and changes of plane, possibly including setting back the shopping frontages behind the residential above with arcaded frontages.

3.2.7 Importance of the Magistrates Court

The Court building, although small, is the principal feature of the High Street. We understand that the Council and our MP wish to retain it and the local residents are seeking listing. The building is clearly intended to dominate, in a subtle way, the rest of the High Street.

As most of the buildings are now 3 floors this relationship works well. We are concerned that higher buildings may be proposed for the south side. We think that the Magistrates Court should remain the dominant feature when the new development is complete. To achieve this we look for:

- A varied roof line
- Maximum of 4 floors along the high street frontage
- Varied designs identifying individual units (See 2.2. 6 above)
- Short and varied frontages
- A carefully designed sky line silhouette as seen from the north side of the high street

3.2.8 The Quality Food Store

We appreciate that this building will need to be close to the centre and will avoid a concentration of food shopping around the Morrisons site. A location opposite the Court, with the bus stops outside would seem ideal, especially if the exact location can be adjusted to allow direct access through the "yard" to the river.

Placing the quality food store in the high street frontage poses a number of problems. We suggest that:

- The major access should be from the High Street
- The entrance should have a short exposed frontage not wider than 2 normal shop fronts.
- Secondary access from car park at rear and/or basement parking
- Retail strategy aimed at short term convenience shopping as much as at weekly strategic shopping
- Architectural design to hide its bulk. The installation of a restored old Brentford Market façade might be a possibility.
- Allow other uses in the same physical building i.e. residential over.

3.2.9 St Lawrence's Church and live/ work units across the site

We would welcome St Lawrence's church being converted into live-work units in the first phase of redevelopment. We believe this to be commercially realistic and it would relate well to the proposed adjacent housing.

Generally across the site we would support more live-work units including some of a size designed for families/artisans.

3.3 Access, Parking and Servicing

3.3.1 Internal “Streets” and “Yards”

We hope that the internal streets and yards within the scheme will have minimum vehicular movement. By TfL standards there will be provision for well over 1,200 cycles on site and population predictions show that the average age of Brentford residents is set to increase significantly. The expectation should be that all will move slowly and safely. None of the routes within the core of the site should be roads.

3.3.2 Servicing and Parking

The majority of vehicle movements, parking and the servicing of shops etc should be from the High Street or be underground (see Hammersmith King Street) leaving the internal roadways to pedestrians, well managed cyclists and at limited hours servicing vehicles.

3.3.3 Access

The access points for service roads will be critical especially as the Half Acre junction is restricted and access through the Ham is frequently congested and/or flooded. We think the service and access issues should be resolved at the outset.

3.4 Preserving The Narrow Yards

3.4.1. Tight Design/Arcades

We are pleased to see the retention of the yards and the proposal to use some for secondary commercial frontage. We note the possibility of arcading some to form a system of all weather shops and/or market stalls with housing above. If the housing is double fronted it should be possible to retain the narrower yards. Alternative cross sections should be discussed with local residents.

3.5 Building by the River

3.5.1. Water Uses

We welcome the study on waterside uses (see section 4.0 for detailed comments). We also welcome the possibility of extending the water area and of making a better connection between the river and the High Street.

3.5.2 A Working River

We are pleased to see that residential uses are not being proposed next to the tidal basin and that Lots Ait may also be restored to use as a boat yard. We are concerned that no boat-related activities are shown around the non-tidal basin. The traditional character of this basin should not be lost, but adapted to appropriate canal side activities and to a traditional canal side character.

3.5.3 Connections to Kew Bridge, Kew and Syon

We have received the Thames Landscape Strategy Report for Brentford (2011) which shows a new line for the footpath from Brentford to Syon. We understand that the land in Syon, opposite the Ham, is being made available for development without cost by the Duke of Northumberland, but funding is needed for its construction. We also understand the Royal Botanic Gardens are considering how a future footbridge from Ferry Quays to the Brentford Gate to the gardens might be located.

3.5.4. High Buildings

In addition to our concern about the scale of the High Street (see 3.2. 6 above) and the practical limitations on tight building around the yards, we are concerned about the proposed heights of the three tower blocks (10/12 floors) and their associated buildings. High buildings in Brentford have not been permitted near the Town Centre and were the cause of major objection on the Commerce Road (first scheme refused on appeal). Additionally they are too close to the Dock Estate, to Syon Park and Kew, and may impact on views from Kew Palace. We suggest careful re-positioning and adherence to the BAAP framework of generally four stories across the site. The report by the Princes Foundation for the Built Environment set an absolute limit of eight stories. This should include any extra ground floor storey needed as a flood plinth.

As with the route/ yard opposite Market Place it would be good to see more than one option presented with respect to massing across the site.

3.5.5. Family Housing

What is the number and mix of residential properties planned for the site? 800 has been mooted. Consider as the detail is worked through that Brentford has an over-supply of new 1 and 2 bedroom flats. Too many of these have been bought for “buy to let” creating a migrant community. We would ask for at least 30% of habitable rooms to be in units with gardens, roof gardens or patios, having 3 or 4 bedrooms.

3.5.6. Non-Residential Buildings

Facilities should meet the total needs of the population and take account of the under provision of infrastructure and amenities which already exists in Brentford. Many of these services will require space on site as well as 106 monies. The centre has to attract families and young people and care for an ageing population, who benefit from being able to walk to the facilities they need. The list should take account of crèches, schools, health centres, gyms sheltered housing and many more.

3.5.7. Cultural Centres

A vibrant centre needs to include an arts centre (now at Waterman’s Park) and other facilities like a temporary winter skating rink combined with cafes and restaurants, art exhibitions, live bands etc. The inclusion of these facilities at Brentford combined with the local attraction at Kew and Syon will make the

new centre a destination for visitors which would in turn promote trade and employment.

We are extremely concerned that there is growing talk of Watermans – originally funded by Brentford S106 funds – being moved to Hounslow. We urge the Council to stick to its community vision for Brentford as a cultural centre and commitment in letters to the Arts Council to support a relocation to Brentford. There is also a need to recognise the significant business risks of moving Watermans (a small social enterprise) from Brentford to Hounslow, as much of its client base would not be retained. This loss of goodwill would present significant start-up costs increasing the organisation's grant dependency.

Hounslow needs to restate its commitment to the relocation to Brentford town centre in the coming weeks if the prospect of including Watermans in a March planning application and subsequent develop negotiations is not to be lost.

4.0 Water Related Uses

4.1 Introduction

4.1.1. This section of the paper reflects a core theme running through the BAAP policies for the site.

4.2. Retain and Expand Existing Uses First

4.2.1. The primary purpose is to retain and improve facilities for existing uses.

4.2.2. All proposals should be based on a character assessment of the existing waterside.

4.2.3 Existing uses should be expanded and improved where possible.

4.2.4 Only after this should compatible new uses be explored.

4.2.5. Scheme should be designed "from the water". Links up to the High Street should be considered as well as those towards the water.

4.2.6. Existing character is predominantly residential and rural, featuring houseboats, trees and wild life rather than the industrial nature of the more distant past.

4.2.7 The local Thames Strategy Guide is recommended as a suitable yardstick.

4.2.8. The presentation by "Smaller World" at the stakeholders meeting had proposed enhancing three existing uses, including heritage boat building, partly based on a shop in the High Street. These were supported however the

introduction of new uses, predominantly sport related, was questioned its emphasis. The balance between these alternative water related uses needs to be discussed further with a cross-section of community stakeholders.

4.2.9 Boat owners favoured the use of Ridgeways for residential moorings rather than more exotic uses. Ridgeways could also be used for light repairs in support of house boats and travelling narrow boats using visitor moorings, retaining the employment and traditional skills without heavy metal bashing at this location. There was little support for a “floating market”.

4.2.10 Metal bashing should be retained at the MSO Marine boatyard. The problem of flood water preventing the use of the ground floor for residential or commercial purposes should be looked at as an opportunity to explore novel uses, generating footfall, in particular avoiding facades of car park ventilation grills.

4.3. Contextual Design Issues

4.3.1. The Thames Landscape Strategy’s 2011 report “Brentford: A Waterway Town” showed proposals to link the site towards Kew Bridge and considered the possibility of a future footbridge to the Kew Gardens Brentford gate. It also proposed a new line for a footpath connection to Syon Park and the London Apprentice on land within Syon Park opposite the Ham. This line would be dedicated by the Duke of Northumberland but requires S 106 funding.

4.3.2. High buildings with flat roofs should be avoided close to the water edge as recommended in the general design guidance in the Thames Landscape Strategy.

4.3.3. View up the Brent River from Kew Palace should be protected. Potential views of the proposed tower blocks up the canal from Kew Palace need to be checked through careful modelling.

4.3.4. The design of the waterside area of the site should seek to preserve and enhance its character especially in those areas designated as a Conservation Area. There is an inconsistency between the three tower block and adjacent buildings with the BAAP guidelines on design starting from the water.

5.0 Stakeholders and Principal Recommendations

5.1. Stakeholders

5.1.1. This paper sets out some preliminary views put forward by members of a rapidly assembled joint working group of members of Brentford High Street Steering Group (Andrew Dakers and Jo Lavery), Brentford Chamber of Commerce (Tim Lockett, Julia Quilliam and Peter Hughes) and Brentford Community Council (Matthew Rockel, Denis Browne and Chris Richards) particularly knowledgeable on the high street regeneration challenge. James Guest (Ealing resident knowledgeable

on town planning matters) and Stephen Fry (Chief Executive of Hounslow Chamber) attended as advisors. Paul Velluet (Heritage consultant) was also invited as an observer but had to send his apologies.

- 5.1.2 We would like to thank Ballymore for appointing Soundings to ensure continuing consultation with local stakeholders during the design and construction of this project.
- 5.1.3 We note the wide interest in the project and we ask that the local community should be kept engaged and informed as the design and construction proceeds.
- 5.1.4 We note the very large number of issues which have already been raised. We ask that when the design team presents its responses to the initial consultations their presentation should be followed by further active dialogue with the community throughout November and December. An iterative design process with active community involvement throughout must be maintained. The community should be part of the site problem solving process, rather than being presented with solutions.
- 5.1.5 This draft paper will be submitted to the three stakeholder groups' committees for amendment/ratification over the coming weeks.

5.2 Summary of key concerns at this stage in process

5.2.1 Massing along river edge - three tower blocks and adjacent waterside blocks a significant concern, given impact on site as whole and views from Kew World Heritage site. Fundamentally proposed heights exceed BAAP policies. Other massing options should be explored with community.

5.2.2 Spatial issues, street plan and access

- 5.2.2.1 Retain Ridgeways Yard (rather than Plough Yard) as identified in BAAP and suggested for retention in Princes Foundation report. The route centres on the Market Place drawing people down from The Butts to the Workhouse Dock.
- 5.2.2.2 Southern end funnel of Boar's Head Yard could be narrowed and our proposed Ridgeways Yard opened up with funnel at southern end instead. This will provide better location for opening onto the Dock. The design approach to this and other sloped yards needs to be explored in greater detail with the community. This will be aided by cross sections being shared as soon as possible.
- 5.2.2.3 The proposals should focus on a car free pedestrian centre to the site. The road surface along northern edge of Workhouse Dock should be totally pedestrianized to maximise leisure potential. This could be achieved by limiting the impact of vehicle movements and bringing car borne access for shoppers and servicing to the scheme below

ground and to the edge of the site. Clitherow Yard should be a Home Zone and a route for emergency vehicle access to the wider site. Live information on car parking spaces should be available at entry points to the town centre. Servicing of major multiples should be by box vans (rather than articulated trucks) out of peak periods as much as possible. Independents will need servicing at more flexible hours of the day.

5.2.2.4 We do not support the present number of vehicle access points to the site. We support key access via The Ham although flooding issues must be addressed. Catherine Wheel Yard should be restricted to servicing access only if at possible. The other key access points for basement level parking could be via a new entry adjacent to Montgomery Wharf Alley.

5.2.3 **Production of economic and retail strategies** for the site must be accelerated by developer, as well as an **Environmental Sustainability Strategy**, to feed into wider masterplanning discussions. Community involvement in the research process is essential. It is vital that these strategies look at the town centre as a whole, rather than the site in isolation.

5.2.3.1 Site specific format for quality food store is required - as well as information on target catchment and traffic management for the additional vehicle movements it will create. We need to understand how this will be complementary to and not instead of specialist food retailers.

5.2.3.2 Watermans - LB Hounslow must stick with the existing strategy to move Watermans to Brentford town centre and confirm this in writing as soon as possible so planning on this move can progress. Watermans is integral to the Brentford cultural quarter concept, Community Vision (2007), BAAP regeneration policy of the Council (2009) and A Vision for Hounslow 2030 (published 2011). With 220,000 visitors per annum Watermans is essential to economic and community cohesion in Brentford and an important compliment to restaurants and other facilities in the new scheme, ensuring that the area is lively in the evening. Even in its present location it is the main public building on Brentford High Street.

5.2.3.3 LB Hounslow promised to produce a paper on retail portfolio management and rental strategy in Brentford several years ago. It is now vital that this dovetails with the production of a retail strategy for the south side of the High Street.

5.2.3.4 First and subsequent phases should be so planned that existing traders can continue to operate on or close to the site during construction and be offered permanent units in the final scheme.

5.2.4 **Consultation process** generally strong but mailshots need to reach approx 10,000 homes (not 5,000), as well as hard to reach groups within the community.

5.2.5 More information needed on **residential mix and parking strategy**

5.2.5.1 Residential accommodation should be varied. At least 30% should have private amenity space and 3 or more bedrooms. As much affordable housing as possible should be provided.

- 5.2.5.2 Provision should be made for crèches, an old people's home and sheltered housing.
- 5.2.5.3 We would welcome St Lawrence's church being converted into live-work units in the first phase of redevelopment. We believe this to be commercially realistic and it would relate well the proposed adjacent housing. Generally across the site we would support more live-work units including some of a size designed for families/artisans.
- 5.2.5.4 We need more information on parking. If as we understand 400 parking spaces are provided for 800 homes, how many parking spaces will be provided for shoppers?
- 5.2.6 **Development appraisals** - Land value assumptions should be put in the public domain as early as possible in pre-application process (by the Council and developer) to inform debate on what total quantum of development is needed for the scheme to be financially viable. Equally, whilst we acknowledge weaknesses in the tool, Ballymore should share Dragons toolkit assessment(s) with community groups early in the process.