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25th November 2010

Dear Denis,

Brentford Lock West: Response from ISIS Waterside Regeneration to BCC letter of 5 Nov 2010

Thank you for your letter, which we received by email on 5 November, submitted on behalf of the Brentford Community Council (BCC) and in response to our presentation of the Brentford Lock West proposals in August. As you are aware, we have now progressed our proposals and submitted an outline planning application. This application is accompanied by a comprehensive set of documents, which address all aspects of the proposals. Full copies of the Design & Access Statement and Development Specification Reports have recently been sent to Denis Browne. A full CD of the application material has also been sent to you separately.

We provide in the following paragraphs a detailed response to the various issues raised. We have attempted to answer all of your queries in full, although in some instances in order to avoid duplication, we have referred you to supporting documentation submitted as part of the planning application. We hope the information provided is clear. For clarity, we have included your questions in red, followed by our responses in black.

1. ISIS stated that the bridge to the other side of the canal landing in public park would be a critical element in making the development accessible.

i. Is it proposed that the bridge should be cycle accessible too:

- Yes. Please refer to the Bridge Parameter report within the Development Specification Report.

ii. Has LBH given any indication as to whether they would welcome such a link:

- The enhancement of pedestrian links across the town centre is an aspiration of the BAAP. The bridge would help achieve this. In addition, the inclusion of a bridge link has been an explicit requirement of London Borough of Hounslow (LBH) throughout our pre-application discussions.

iii. Since the eastside landfall of the Bridge would have to be in Robin Grove Park what approaches have been made to the Council to secure permission for this and what has been done as a result of these:

- Discussions have been undertaken with LB Hounslow. LBH will be granting a legal easement for the bridge landing.

iv. **What work has been done to model the flow of pedestrians and cycle traffic through Robin Grove towards and back from the station at peak hours?**

- ISIS' transport consultants, Colin Buchanan have considered the level of weekday peak pedestrian demand for the bridge, taking into account the proposed development and existing businesses on Commerce Road. This estimates a two-way pedestrian flow of less than 100 people per hour during peak hours only (91 during am / 77 during pm). This is based on the likely number of people walking to the station from / to the development as well as those accessing the existing businesses along Commerce Road. These figures would be considerably less outside peak hours.

v. **Since the foot bridge is one link in the chain to Brentford Station and a full and proper access to that destination is essential to make this route feasible and desirable, would ISIS disclose the dialogue in full between themselves, TfL and Network Rail as to how the west end of the station might be made more accessible and how this is to be funded?**

- The bridge will provide an important element of the link in the chain to Brentford Station. We are, however, not reliant on the bridge to improve the Public Transport Accessibility Level (PTAL) of the site.
- We confirm that we have and will continue to engage all relevant parties in the process of securing the link to Brentford Station. It needs to be recognised, however, that whilst securing this link is desirable it is not an essential pre-requisite of the Brentford Lock West proposals.

2. ISIS acknowledged that, given the PTAL of the site (2-3) - even with the bridge – the car would still play a significant transport role. Although traffic generation would be 50% lower than that of the previous scheme it is estimated that this would still mean 350-400 vehicles on site.

- To clarify: The PTAL of the site is 2-3 at the moment, even without the bridge. The provision of additional bus stops along Commerce Road alone will lift the PTAL of the site to 3.

i. **Is this a fair/accurate assessment of the number of cars? If not what is the correct figure?**

- The Transport Assessment submitted with the planning application includes a detailed assessment of the vehicle trip generation of the proposed development. This is based on trip rates that have been agreed with LB Hounslow. For non-residential uses the same rates that were used in the BAAP Transport Study were adopted. For residential uses observed trip rates from recent developments in the area were applied, with suitable adjustments made to reflect the higher number of three bedroom units proposed for the Commerce Road site. The total two-way vehicle trip generation in the AM and PM peak hours has been estimated as 184 and 197 respectively.
- The total number of parking spaces on-site would be 430, with an additional 15 existing spaces also retained along Commerce Road.

ii. What would be the impact of the additional commuter traffic joining London Road at peak hours? Has this been assessed/modelled?

- The Transport Assessment includes detailed assessments of the impact of this additional traffic on the junctions on London Road. In summary the findings of the assessments are:
 - The Ealing Road / High Street junction would operate within capacity in the AM peak with the full green time available and with the development in place. If the eastbound exit is blocked the western arm would be over-capacity, as it would be under existing flows. However, as this is not the normal situation no mitigation is required. In the PM peak the junction would be over-capacity and mitigation would be needed. It was found that altering the signal timings within the existing cycle time would, however, bring this junction back within capacity.
 - The Half Acre/High Street junction would operate within capacity in its current form with the development in place in the AM peak, but would be over-capacity in the PM peak with the fixed signals timings that currently apply. As with the Ealing Road junction, altering the signal timings within the existing cycle time would bring the junction within capacity. It has also been demonstrated that a workable layout can be achieved for a four-armed signal junction to serve the Land South of High Street site in the future, but this would not be implemented as part of the Brentford Lock West scheme.
 - The Tallow Road junction would be within capacity in the AM peak with the development in place and full green times available. With a reduced green time it would be over-capacity, but would operate better than under the observed traffic flows. The junction is within capacity in the PM peak. It is our view that mitigation is not strictly necessary at this junction, but is clearly a bottleneck to flows along the High Street. Discussions with LB Hounslow have identified that this is a junction the TfL have asked them to consider for removal as part of their aspirations to reduce the numbers of unnecessary traffic signals in London. We have, therefore examined the potential to do this and found that it would work well within capacity as a priority junction.
 - The Commerce Road junction was found to operate within capacity in both peaks, with the development traffic in place. However, there are limited pedestrian facilities at this junction and options for improving them to cater for existing pedestrian demand have been identified.
 - The Spur Road/Twickenham Road junction is over-capacity in both peaks with the development traffic in place and is slightly worse than the existing situation. A minor improvement scheme has been identified that would mitigate for the effects of development traffic.

3. To combat the impact ISIS proposed that there should be improvements to the junction between Commerce Road and London Road.

i. What would these be?

- In order to mitigate the traffic impact identified, the following measures are proposed and would be funded by S106 contributions:

- optimisation of the PM peak signal timings at both Ealing Road / High Street and Half / Acre / High Street; and
- either implementation of an improvement scheme to the western approach to the Spur Road / Twickenham Road junction or provision of an equivalent financial contribution to an improvement scheme being examined by LB Hounslow.
- In addition to the measures that are identified as being necessary to mitigate for traffic impact of the proposed development the removal of the traffic signals at Tallow Road has been identified as being beneficial to the flow of traffic on the High Street and to traffic accessing the development site. A S106 contribution will therefore be made towards the delivery of this.
- As well as mitigating for the impact of development traffic a number of improvements to non-car modes of transport will accompany the development. These include:
 - Improvements to the Commerce Road junction to introduce a pedestrian phase for crossing London Road.
 - Replacement of the zebra crossing to the east of Commerce Road with a pelican.
 - The provision of a new pedestrian / cycle bridge from the northern end of the site across the canal. This will provide an alternative walking route from the site to the station as well as giving those who live to the east of the canal another access to the canalside towpath.
 - Improvements to (including widening of) the towpath alongside the site.
 - Improvements to footways along Commerce Road.
 - Creation of permeable pedestrian routes through the site.
 - Replacement of the existing bus garage with a modern facility with a longer lease, ensuring its future.
 - Provision of bus stands for the E2 / E8 routes within the garage.

ii. Exactly how would they ameliorate the potential for congestion to an acceptable level especially at peak hours?

- The measures to mitigate for traffic impact will result in the junctions considered performing either within capacity (i.e. with degrees of saturation of less than 90%) or no worse than they do at present.

iii. Specifically what effort has gone into creating a north end link from Commerce Road onto the Great West Road?

- This suggestion was made at an early stage within the public engagement exercises. In response we undertook a review of the engineering feasibility of achieving an acceptable vertical alignment to go over or under the railway line. This exercise confirmed that it would not be possible to provide a bridge over and remain within the maximum acceptable gradients. In addition, the exercise confirmed that a tunnel might be achievable within the required design standards. However, the feasibility exercise confirmed that the provision of such a bridge would not be possible for the following reasons:

- TfL indicated that they would not support the creation of a new junction with the A4.
- The delivery of a new link would require the acquisition of land outside the control of ISIS waterside Regeneration.
- The construction costs associated with providing a new link would make the redevelopment financially unviable, without even giving consideration to costs associated with acquiring the land necessary to deliver it.
- The provision of a link of this type was therefore ruled out at an early stage of the scheme design. The above findings were shared with the wider consultative group of local stakeholders.

4. ISIS disclosed the news that Brompton Bikes were considering moving into the end shed at Commerce Road and having a showroom there.

- i. Would Brompton be willing to communicate how concrete their plans were regarding this? Are they seeking alternative premises and if they failed to find such what would be the consequences?
 - While discussions have been undertaken, Brompton Bikes do not form any part of the planning applications. The preferred application involves the creation of a business centre associated with the retained warehouses and new commercial floorspace fronting onto Commerce Road. A total of 7,000sqm (GEA) of commercial (B1) uses is proposed. However, discussions with Brompton Bikes are ongoing and ISIS will continue to actively encourage and engage with them to facilitate their relocation.
- ii. What is the current motor vehicle trip generation to their current site? Could BCC have this broken down by day and times of day please? (It is reasonable to assume that such trip generation would be the same at the new premises and this needs to be considered regarding the impact this would have on the Commerce Road/London Road Junction.)
 - As Brompton Bikes do not form part of the current planning application this information is not relevant to this application. (see Development Specification and Design and Access Statement).

5. ISIS described the residential part of the development as some town houses but the majority of units being largely apartments with dual aspect. The height of the scheme is predominantly 5 stories with occasional 6 stories with a 9-11 stories at the back of the site adjacent to the canal and railway. Parking was to be accommodated in a semi-basement.

- To clarify: the tallest element of the scheme is in fact only 8-10 storeys, NOT 9-11 storeys. In addition, some parts of the scheme are only 4 storeys.

6. ISIS acknowledged that LBH currently had concerns over privacy distances: the actual street width distances between buildings are only 14m (street-width) whereas a 20m distance is required. Isis was working on this: they did not wish the development to feel cramped or canyon-like and believed this could be achieved by off-setting building lines and by careful orientation of buildings.

- i. Please would ISIS provide a complete embellishment of what exactly it is they are proposing in this aspect?
- The application is in outline, and so it does not propose any specific design solutions at this stage. What it does set is a series of development 'parameters' and principles, which should be complied with. Those relevant to the 14m streets are set out within page 64 of the Development Specification. Further illustrative information is provided within P.56 of the Design and Access Statement.
 - The principle of slightly narrower residential streets is something which has been discussed with LBH officers at length. The urban design intention of the masterplan is to in some way respect if not replicate the traditional narrow lanes which historically connected Brentford with its waterways. The urban design ambition of the masterplan is to produce intimate streets which relate to human scale in terms of their dimensions. The narrow streets also help with the intention to make the internal streets within the neighbourhood pedestrian, rather than car dominated.
 - The principle of establishing narrow, human-scale streets forms the basis for some of the best traditional and more recent residential and mixed-use neighbourhoods within the UK and further afield (e.g. Bo01 in Malmö, Hammarby in Stockholm) – all exemplary urban design projects which the design team have hands-on experience of.
- ii. Since several designs for the 9-11 storey tower-block were shown please can we have details of each?
- Please refer to the Design and Access Statement (P.64)

7. It was suggested that the necessity of having a tower-block was driven by the price paid for the site versus current sales prices on residential units in that a higher density for the site is required to balance the books. The architects protested that this had not been a driver for their design.

- i. What parameters were given to the architects as regards density for this development?
- The architects and urban designers brief was to deliver a high quality scheme which makes efficient use of the site, and respects the scale and form of surrounding development. In respect of the wider masterplan, the brief effectively originated out of the Design for Change Workshops which were held with the community back in Sept / Oct 2009. The masterplan parameters have been driven by a complex interplay of factors which have included urban design; townscape; physical; and technical factors including sunlight/ daylight, amenity and overlooking; and viability. (See the answer to point 7.ii below regarding masterplan density)
 - The urban design rationale underpinning the taller element of the masterplan (i.e. Block B) and the various discussions with Hounslow officers concluded that:
 - it would be appropriate to terminate the view down Commerce Road with a taller building (or buildings);
 - this corner of the site is the most appropriate location to take extra height due to the distance from the canal-side, and its separation from more sensitive (i.e. residential) uses within the surrounding area, being located adjacent to the railway and bus depot;

- that a concentration of development and height in this location would reinforce the ‘corner’ function of this part of the site and enable a solution to be found which could help act as a buffer between the railway line / bus depot and the rest of the new neighbourhood;
 - providing higher buildings in this part of the site would help with the transition between lower rise buildings in the Commerce Road area and much taller buildings along the Great West Road corridor;
 - that Block B must complement and book-end the warehouse and make an architectural statement at the end of Commerce Rd, in order to aid legibility and enhance the overall townscape.
- In addition to the above points, please refer to Page 64 of the Development Specification report under 9.2 Block B.

ii. **What is the density across the site that will be achieved for each of the proposed designs?**

- The net density of the submitted scheme is 119 units per hectare. This accords with prevailing adopted (London Plan) policy.

iii. **What is the density for the site excluding the tower-block?**

- Density should be considered on a site-wide basis, not in relation to a single element. Therefore, please refer to the answer to question 7ii above.

iv. **What is the density for the tower-block solus?**

- The design rationale for the scheme as a whole is set out in the Design and Access Statement. We do not think it necessary or relevant to provide a breakdown of density for the individual components of the scheme.

8. On Commerce Rd ISIS proposed to have double height commercial units with flats over: this would diminish the intrusive effect of passing busses from the existing garage.

i. **What sound insulation features would these units have on the road side: double or triple glazing? and what would be the air-gaps of such glazing?**

- As the application is in outline, precise measures have not been identified. However, the acoustic engineer has recommended that the use of standard glazing along Commerce Road would be sufficient to mitigate the impacts of any buses passing along Commerce Road.

ii. **What was the rationale behind making these units separate residential units?**

- The original intention was to design these as integrated live-work units. However, at the Council’s request, these were converted into separate commercial and residential units.

iii. **Would the residential units over be available only separately from the commercial units or was there a possibility of being designed as live/work units?**

- Please refer to the answer to question 8ii above.

9. To avoid a 'canyon of development' ISIS want to establish a Canal Square area at the North end of the development near where the landing of the west arm of the potential footbridge.

- We do not understand this "canyon" comment. The scheme has been designed as an appropriate response to the scale and character of the Canal. Buildings are set back from the Canal edge by at least 10m (significantly more generous than the Island Development opposite). In addition, a number of water-side spaces have been introduced along the Canal frontage and waterside buildings have been limited to 4 and 5 storeys. Therefore, we feel that the townscape response is entirely appropriate.
- i. The BCC understand the idea of bringing GSK staff down the tow-path at lunch-times to a café/eatery of some kind and then on to the High Street. However, how practical is this aspiration? Have GSK staff been surveyed about how they would feel about this and whether they would use this route especially during winter months?
- The intention is to create an attractive new, and widened pedestrian route between the Great North Road and the Town Centre, punctuated by a series of spaces. The new square will accommodate one café/ eatery, primarily serving residents and workers of the new development, but open to others also. This will encourage greater movement along the waterway at all times of the day and year, through providing a vibrant, visually attractive route, incorporating spaces to pause, interact and relax.
 - The intention is not just to target employees of GSK, but all residents, employees and visitors based in, around or passing through Brentford. However, the proposals would broaden the range of leisure options open to GSK and other workers within the area and add to the quality and diversity of the Brentford retail/ restaurant offer.
- ii. Given the exits from GSK are closer to Boston Manor Road than the canal and given that many know that route from the station are they not more likely to access the High Street this way?
- We cannot dictate whom, when or how the route will be used. However, we feel that the enhanced environment created by the proposed development would offer an attractive alternative route to the Town Centre.
- iii. How many currently use the Boston Manor Road route at lunch times?
- We do not have this information, nor is it relevant or material to our application proposals.

10. Although it is understood that there is no intention of competing with the High Street – rather the intention is to support it –

- i. Is there no a danger that this will happen with the Canal Square proposal
- ii. What will ISIS do to safeguard against this happening?
- In response to both of the above: We originally proposed to provide 1,400sqm of café/ restaurant uses within the proposed development. However, following discussions with LBH, this was reduced to 860 sqm (GEA), which will equate to only one café/ eatery. This quantum of food and drink uses is intended to cater for the

operational requirements of the scheme and will compliment rather than compete with the town centre.

11. The last BW Water space Strategy was formulated and concluded without proper consultation. Brentford has had to bear the effect of this in recent years.

- i. How will ISIS ensure that this does not re-occur with the new waterspace strategy to which they referred?
 - British Waterways (BW) is responsible for the development and delivery of the waterspace strategy for Brentford. BW is undertaking consultation on the waterspace strategy at present and we understand that a Final Draft of the Strategy has been issued to Brentford Community Council for comment. During the engagement events leading up to the planning application submission for Brentford Lock West, ISIS and BW (who attended every event) have at every opportunity tried to encourage and facilitate debate on the subject of waterspace. ISIS and BW have also been pressing for a meeting with LBH Officers and Key Members to discuss the waterspace strategy for Brentford.

12. The proposed strategy referred to a Freight 'node' south of the High St: however it was acknowledged that this is speculative as it would occur on land not in ISIS or BW control.

- i. Since BW's 'freight consultant' admitted that the real problem with freight at Brentford was that the channel was not dredged would ISIS or BW give a commitment to funding this through a section 106 agreement?
- ii. Would ISIS include proposals for freight transfer within the development?
 - In response to both of the above:
 - British Waterways promotes waterborne freight transport, wherever practical, economically viable and environmentally desirable. The Waterspace Strategy has found that the (Brentford Lock West) site provides no viable transshipment (wharf) opportunities that could support local or regional water freight. This is due to the inability of water-borne freight transportation to compete with road-borne transportation, constrained access to the site, incompatibility with surrounding development, the tidal nature of the entrance to the River Brent/Grand Union Canal from the River Thames and the absence of any existing market demand or demand forecasts for freight by water on Brentford's waterways. The strategy also confirms that if this part of the Grand Union Canal was to become viable then other sites would be more suitable e.g. Transport Avenue. Therefore, no large-scale freight uses are proposed on-site.
 - However, there may be an opportunity to exploit the Canal and the overhanging sheds for some small-scale transportation of material to and from the site, if this proves viable. This could include household waste, trade goods or future biomass deliveries for the neighbourhood's CHP system.
 - Section 106 (S106) Agreements are used to make acceptable development which would otherwise be unacceptable in planning terms. They should be directly related to the proposed development and fairly related in scale and

kind. As this development does not propose any large-scale freight uses, it does not create a need to dredge the Canal.

iii. A question was asked about where new moorings could be established but it was felt this was not fully answered: please can we have full details as to how these will be established?

- The Waterspace Strategy for Brentford Lock West highlights an area on the off-side of the canal adjacent to Robin Grove as having potential for future visitor moorings to further maximise Brentford's attraction as a water-based visitor attraction. The delivery of new moorings at this location will require further consultation and discussion with LBH, the local allotments group and neighbouring residents and will ultimately be delivered by BW. The provision of new moorings does not constitute part of the planning application for Brentford Lock. It should be noted that the existing visitor moorings alongside the development are being retained

iv. Would ISIS welcome the BCC's waterways expert being co-opted into discussions between LBH and themselves on this aspect of the development?

- Please could BCC clarify which aspect of the development is being referred to in this question?

13. In terms of pressure on local facilities the BAAP allowed for an increase in population and the scheme would not exceed the headroom this gave. There is a community concern that this does not take into consideration the reality of the matter that the new facilities required for education and health had not forthcoming and unlikely to be so given the financial climate.

i. Is ISIS aware that this would make their development less attractive to purchasers?

- ISIS is aware of the existing community services and facilities in the area and we are confident that the new Brentford Lock West neighbourhood and its associated facilities and amenities will make a welcome contribution to the wider area. We are also confident that the range of services and amenities nearby form part of an attractive package which will help entice new residents and businesses to Brentford Lock West.

ii. What would ISIS be doing to address this?

- From the outset LB Hounslow asked ISIS to assess Brentford's capacity to accommodate a development of the scale proposed on the Brentford Lock West site. The baseline for this assessment is the BAAP, which sets out Brentford's future infrastructure needs against planned development. In consultation with the Council, ISIS have assessed the level of development that has come forward against that anticipated by the BAAP. As a result, both ISIS and the Council have concluded that there is sufficient headroom to accommodate a development of the scale of Brentford Lock West within the parameters set by the BAAP.
- In light of the above, ISIS would expect to contribute towards community infrastructure provision in the normal way i.e. through the provision of section 106 contributions towards off-site provision, in accordance with standard Council formulae.
- However, although educational or health facilities do not form part of this application, ISIS understand LB Hounslow's concerns. Initial conversations have

taken place over the accommodation of a new school on part of the site.
Discussions are ongoing.

14. ISIS stated that all family sized units would have gardens and terraces: there would be access to open space of 7.5m/household. In addition the proposed footbridge to Robin Grove Park would give access to that facility. There would also be the Canoe Centre and Brentford Community Sports Centre is nearby. ISIS understood the deficit of facilities in Brentford for teenagers and the need to contribute to the community.

- i. since a youth club is sorely needed, would ISIS consider providing such a facility within the development for the area?
 - Provision is made for 860sqm of leisure/ community space within the scheme. The application envisages provision of a canoe club and other community space, which will be geared towards use by children and teenagers.

15. Finally, is it ISIS' intention to:

- ii. Manage the resultant development themselves?
 - ISIS will appoint an appropriate management company to manage the completed development.
- iii. Contract out to a property management company?
 - Please refer to the answer provided to 15.ii
- iv. Sell on the development to a third party in due course?
 - ISIS is committed to taking the site forward for development, however, there could be the possibility of bringing in partners as part of the development in the future. If this is the case, however, this will be undertaken in strict accordance with the appropriate planning consents to ensure the ambitions of the masterplan are adhered to.

We hope this letter has provided a satisfactory response to your queries. Please do not hesitate to give me a call should you wish to discuss any of the above.

Yours sincerely,
For ISIS Waterside Regeneration

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Enc

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