

Isis Waterside Regeneration's site at Commerce Road, Brentford End: The conservation issues that need to be addressed in progressing new proposals for redevelopment – Revised draft initial outline

Introduction

This report identifies and considers the conservation issues that need to be addressed in progressing new proposals for the redevelopment of Isis Waterside Regeneration's site at Commerce Road, adjacent to the Grand Union Canal at Brentford End. It reviews the *Initial appraisal of conservation issues* report prepared in February 2006 by CgMs and the relevant conservation issues arising from the proposed redevelopment of the Commerce Road site in relation to its architectural and historic value and significance and its relationship to the adjacent part of the canal-side area of Brentford, with a view to informing the relevant parts of the emerging Development and Planning Brief.

The report draws upon the relevant formal guidance of Central Government on the control of demolition and development within and adjacent to conservation areas (1); the relevant and available conservation policy and guidance documentation and other information prepared by the London Borough of Hounslow Council (2); the published guidance of English Heritage (EH) on the preparation of conservation area appraisals and on the management of conservation areas (3); and the research and other work published by EH in 2000 relating to the particular architectural and historic interest and significance of the waterside area at Brentford and the case for its designation as a conservation area. The report also takes account of the inspector's conclusions arising from the Public Inquiry into previous proposals for the redevelopment of the Commerce Road site issued in November, 2007.

The *Initial appraisal of conservation issues* by CgMs

The report by CgMs of February, 2006, provides a useful base for an understanding of the modest architectural and historic significance of the existing buildings on the Commerce Road Site. However, the report it would benefit from clearer map-related identification and cross-referencing of the individual buildings and structures discussed.

Importantly, given that it was only intended to serve as 'an initial appraisal', the information provided in the report needs to be adjusted in part and considerably amplified and enhanced in order to address all the conservation-related issues that are likely to be considered relevant by the London Borough of Hounslow Council's staff and prospective consultees in discussion and negotiation regarding the future development of the site.

There are several key areas where adjustment, further research and increased emphasis are required.

The Commerce Road site, and indeed, the entire area to the west of the River Brent falls within the area known as Brentford End, located historically within the parish and manor of Isleworth, and wholly separate from New Brentford, the area to the east of the River Brent, which fell within the parish and manor of Hanwell until 1749 (thereafter, the parish of St. Lawrence, New Brentford), and Old Brentford, further east, which was located historically within the manor of Fulham and the parish of Ealing. In terms of local government administration in the 20th century, from 1932 until 1965, the entire area to the west of the River Brent fell within the Borough of Heston and Isleworth, and that to the east of the river, in the Borough of Brentford and Chiswick. With a distinctively different local administrative history than New Brentford and Old Brentford to the east of the River Brent, right up until major local

government re-organisation in 1965, Brentford End reflects a very different social and functional history. To quote Alan Godfrey in his introduction to his reprinting of the Ordnance Survey map of the area for 1894: 'Brentford End, the area west of the Brent and part of Isleworth parish, calls for little comment except to remark on the nurseries and market gardens that dominated the scene; this was the traditional industry of the area, which was especially famous for its strawberries'. Such a characteristic is perhaps reflected in the location of the long demolished Middlesex Jam Company's Bridge Works close to the southern end of the present Commerce Road in the early years of the 20th century.

Reference to the 1:2500 scale Ordnance Survey maps of the area published in 1865, 1894/1896, 1915 and 1936, and the Goad Insurance Plan of 1907 show that the entire Commerce Road site was free of built development right up until at least the late 'thirties and probably later. Indeed, the 1907 Goad Plan shows the area as nursery gardens. This is in marked contrast to the canal-side area of New Brentford to the south-east where there has been high-density built development for centuries and concentrations of industrial uses since the opening of the canal at the beginning of the 19th century and the completion of the Great Western Railway spur line to Brentford Dock in 1859.

From a recent inspection of the existing buildings on the Commerce Road site, and from an examination of the *Age of buildings survey* undertaken by Hounslow Council's conservation staff at the behest of the GLC's Historic Buildings Division in the 1970s (now retained in the Council's Local Studies Collection) and of the street-directories, it seems that many of the buildings were built in the post-War years, and the others at the southern end of the site in the immediate pre-War years. It would be most useful to be able to verify the dates for the construction of the post-War buildings on the Commerce Road site given in the *Age of buildings survey* and to determine the dates of construction of the earlier buildings drawn from available information in the Council's Building Control and Planning records and other sources, and details of the original and subsequent businesses that occupied the buildings, drawn from directories and other sources. From the presently available information in the Council's Local Studies Collection, it appears that unlike most other canal-side sites in Brentford, only two of the existing buildings have any association with the canal or canal-related industrial activity, and this, only in modest part. Other than in relation to their geographical proximity to the canal, the existing buildings could form part of any typical West London industrial estate, developed in the immediate pre-War and post-War years.

Inspection of the site reveals that with the exception of the two, very large, double-shed workshop/warehouse buildings at the north end of the Commerce Road site, none of the existing industrial buildings enjoys - or has ever enjoyed - any direct link or access to the canal or the canal-side path along the side of the canal. In this connection, there is no direct functional relationship between the Commerce Road buildings and the canal and canal-side path. Indeed, the entire site is separated from the canal-side path by a break in level of approximately 1.5m. to 1.8m., clearly marked by a reinforced-concrete retaining wall and fences of various kinds extending along the entire length of the site adjacent to the canal. Whilst the two, very large buildings at the north end of the site extended over the canal-side path and a small, single-ended dock off the canal, and provided travelling cranes to provide a facility for loading and unloading from barges canal boats, there is no physical evidence to show any direct connection between the main floor level within the buildings and the canal-side path.

The Grand Union Canal and Boston Manor Conservation Area

A very limited part of the Commerce Road site – specifically those parts of the two, very large buildings at the north end of the site which project above the canal-side path and the small dock off the canal – is located within the *Grand Union Canal and Boston Manor Conservation Area*.

The conservation area was designated by Hounslow Council in July, 2001, in response to threatened action by English Heritage to use its powers to designate a conservation area that would have afforded formal recognition and protection to the entire canal-side area of Brentford, a large part of which was threatened by outline proposals for substantial redevelopment that would have seriously damaged the character and structure of the surviving historic core of the town; particularly that part to the south of the High Street. Such action by English Heritage followed the publication by EH of *Report on the waterside area at Brentford (Historical analysis and research team reports and papers 26)* in 2000, and *Proposed conservation area designation: Supporting statement – River Brent and Grand Union Canal, Brentford, London Borough of Hounslow* in November, 2000. Whilst English Heritage proposed the inclusion of the canal between the bridge carrying the High Street-London Road across the canal and the bridge carrying the South-West Trains railway line across the canal within the proposed new conservation area, it excluded the Commerce Road site except for the projecting sections of the two, large buildings at the north end of the site. Significantly, in the related building study contained within the *Supporting statement* it did not identify those projecting sections as ‘buildings and structures of interest’.

Hounslow Council responded to the threatened action of English Heritage by designating its own conservation area – the *Grand Union and Boston Manor Conservation Area*, including the entire length of the canal and some adjacent areas within the designation, but excluding key parts of the historic core of Brentford to the south of the High Street.

Contrary to the published guidance of English Heritage on the designation and management of conservation areas contained in *Guidance on conservation area appraisals*, the Council has no conventionally published and readily available character appraisal and management guidelines for this or other conservation areas in the Borough. Instead, it has batched together a series of draft appraisals (without definitive maps or diagrams) for each conservation area in each of its respective planning areas, which are attached to a Planning Committee report of January, 2006, which is available for down-loading from its web-site. The appraisal for the *Grand Union and Boston Manor Conservation Area* is attached with those for seven other conservation areas in the appendix for the Council’s Brentford and Isleworth Planning Area. Copies of definitive maps of the *Grand Union Canal and Boston Manor* and *The Butts Conservation Areas* have been kindly provided by the Council’s conservation staff but cannot be reproduced in this report for copyright reasons.

Significantly, in the section of the appraisal addressing the character of the designated area, it is stated that:

The conservation area has many different characters depending on which part of it you are located (sic). The common link is the canal passing through the area of cultivated and naturalistic landscapes, some of particularly scenic and/or ecological character. These vignettes and contrasts are the essence of the slow travelling canal boat and towpath, and some are enjoyed as glimpses, at greater speed, from the tube train and the motorway’.

In relation to that stretch of the canal adjacent to the Commerce Road site, it is stated:

‘On the west bank, above the towpath is an area of warehousing and works, including a pair which extend into a dramatically over-hanging but now rather desolate canopy end (sic) for boat-repairs (sic). Much of the industrial activity has receded, and at present the scale of the other west-bank buildings reflects current and former uses, and by being low-lying give spatial priority to water (sic). Small-boat and water related activities, for leisure and working purposes, need visual and actual elbow room, a sense of space. The towpath along the basin is used for

boat mooring. The buildings of the area, whilst no longer dependent on waterborne transport (sic), are still of an appropriate scale and character’.

It is difficult to determine to which ‘buildings of the area’ the author of the appraisal refers, given that the various, visually **and architecturally** undistinguished, industrial sheds on the Commerce Road site which back-on to the canal fall outside the conservation area, and those buildings which fall within the conservation area are the substantially scaled new residential and **Holiday Inn Hotel** developments immediately adjacent to the Locks, approved by the Council in recent years.

However, the author of the appraisal rightly observes that:

‘On the intervening Island, the former water-industry works (sic) have been superseded by dense housing development of the new century. This is lower at the northern end and has its own small area of naturalistic landscape’.

Significantly, the appraisal does not identify specific canal-side buildings which ‘contribute positively to the character, appearance and special interest of the area’ for which there is a presumption for retention. Indeed, the emphasis of the document is directed towards encouraging high quality new development as and when opportunities arise.

Insofar as discerning the present prevailing urban character and appearance of that part of the conservation area along the stretch of the canal between the two bridges, it may be reasonably argued that it is primarily one of attractive modern housing of appropriate scale and design, with generous **residential** moorings along the canal itself. Indeed, the once dominant form of the projecting sheds at the north end of the Commerce road site is now seriously compromised in all views northwards along the canal by the considerable height and bulk of the Smith Klein Beecham Headquarters on Great West Road beyond, the development of which was approved by the Council about ten years ago.

It may also be reasonably argued that the primary interest in conservation area terms of the projecting sheds, is not so much in their unattractive and bulky profile, comprising painted, corrugated galvanised steel sides and corrugated asbestos-cement roofs, nor in their former industrial use, but rather in the partly-cantilevered steelwork structures that support them and in the small, **single-ended** dock and with its small mooring bollards directly below. In this connection, consideration **should** be given to the potential for retaining and incorporating the dock **and to the possibility of retaining and incorporating** the interesting cantilevered steelwork of the southern-most of the two sheds.

Buildings on the Commerce Road site

With the exception of the now demolished but long-established group of industrial buildings, dock and wharf on the north-west side of the canal immediately adjacent to Brentford Bridge (which carries the High Street across the canal) and Brentford Gauging Locks and to the east of the site of the former railway bridge carrying the Great Western Railway spur line serving Brentford Dock across the London Road (shown in the Ordnance Survey maps for 1865, 1894-1896, 1915 and 1936) and the now demolished group of single-storey buildings extending along the north-east side of the embankment carrying the railway and the south-bound platform of Brentford Town Station (later, from 1901, to serve as a permanent way stores yard for London United Tramways) (also shown in the maps), the entire Commerce Road area remained wholly undeveloped until the late 1930s (see maps of the area from 1865 onwards appended, attached as Appendix A). London United Tramways’ yard is specifically shown on the Goad Plan of 1907 together with the adjacent Brentford Town Station (served by trains on the

Great Western railway spur line from Southall to Brentford Dock) which operated between 1860 and 1942. Anomalously, whilst the Ordnance Survey maps for 1915 and 1936 show no tramway connection into the yard, undated photographs published in Robert Harley's *Hammersmith and Hounslow Tramways* (Middleton Press, 1999; illustrations 60, 61 and 62) clearly show such a connection.

The present Commerce Road 'industrial estate' to the north of the recently completed hotel and residential sites close to the Bridge and Locks comprises a variety of industrial and other business buildings and open areas developed from the late 1930s until very recent times, and possessing no particular and overall coherent architectural character or interest.

All but one of the buildings on the north-east side of Commerce Road and extending towards the canal fall within Isis Waterside Regeneration's site and are now disused. Of these, only the two, large former industrial buildings, comprising large steel-framed sheds, at the north end of the site (identified as Buildings 8 in the CgMs report, and as D and E Blocks in Vokin's plan) have any association with the canal, and that, only through the overhead craning facilities they possess. The six buildings on the north-east side of Commerce Road at the end nearest Brentford Bridge (those within Isis Waterside Regeneration's site identified as Buildings 1, 2, 3, 4, 5 and 6 in the CgMs report, and as nos. 2, 3, 5, 6 and 1-6, Commerce Road in Vokin's plan), including those at the corners of the short cul-de-sac road extending towards the canal (Buildings 2 and 3/nos. 3 and 5, Commerce Road) comprise two or three-storey, office, frontage buildings behind which extend long, single-storey industrial sheds. All these, appear to have been developed in the late 'thirties or the 'forties. The single-storey extension building to the immediate north (Building 5/no. 6, Commerce Road) is indicated on the Council's *Age of buildings survey* as dating from 1960, with separate and more recent single-storey buildings behind (Building 6/nos. 1-6, Commerce Road). The two vast buildings beyond, each comprising double, steel-framed sheds (Buildings 8/Blocks D and E), are indicated on the *Survey* as dating from 1963 (the northernmost, Block E) and from 1960-1964 (the one to the south, Block D).

All the buildings on the south-west side of Commerce Road with the exception of the Brentford Business Centre (which appears to be of recent origin) are shown on the Council's *Age of buildings survey* as dating from the late 'forties and the 'fifties.

The absence of any overall coherent architectural character or interest and of any significant canal-side associations is rightly reflected by the exclusion of the entire area from the *Grand Union Canal and Boston Manor Conservation Area* as designated by the Council in 2001, and from the boundary of the area recommended for designation by English Heritage in 2000.

The only buildings of any intrinsic, external architectural interest are the five, two and three-storey frontage buildings on the north-east side of Commerce Road (the two on the north-west side of the junction with the short cul-de-sac (variously annotated on the Ordnance Survey maps as East Street or Commerce Road) and the three on the south-east side of the junction built as offices to serve the industrial sheds behind. The front and return elevations of each of these five office buildings, four of which are located within Isis Waterside Regeneration's site, possesses various quasi *Art Deco* architectural features. Regrettably, in most of the buildings, the original 'Crittall' steel-framed windows have been replaced in part or in whole by unsympathetic new windows. Whilst the buildings provide some pleasing visual relief from the generally banal architectural quality of the area as a whole, none of the frontage buildings, let alone the industrial sheds they serve, bear comparison with the inter-War factory buildings along the Great West Road to the north of the site, a number of which are listed, nor possess any canal-related features or characteristics.

As noted above, the north-east ends of the two, large, former industrial buildings at the north of the site (Buildings 8/Blocks D and E); each comprising, twin sheds of light, steelwork construction with painted, corrugated, galvanised-steel sheet sides and corrugated asbestos-cement sheet roofs with glazed roof-lights; project above the canal-side path and a small, single-ended dock off the canal, each with overhead, travelling-crane facilities for loading and unloading goods from the canal. Significantly, the sheds are very similar in scale, form and character to the two-part shed that spanned the island between the Grand Union Canal and the River Brent (shown in the Ordnance Survey map of 1936) and which projected over the canal and river at the respective ends; the demolition and redevelopment of which the Council approved in recent years.

The buildings (Block E comprises twenty-one bays, with an additional four bays projecting above the path and dock; Block D comprises twenty-two bays, with an additional three bays above the path and dock) are of standard, mid-20th-century industrial design and construction of little or no architectural or structural interest or significance. However, the cantilevering section of the southern-most of the two buildings that extends above the canal-side path and the small dock is of some constructional interest, and consideration might be given to the retention and incorporation of this part of the building into future development of the site. However, overall, neither Block D nor Block E taken in their entirety can be seen as making a positive contribution to the character or special interest of the *Grand Union Canal and Boston Manor Conservation Area* or its setting.

Relevant policy and guidance in relation to conservation interests

In developing proposals for the future development of the Commerce Road site regard will need to be given to the relevant, formal advice of Central Government on demolition and development within conservation areas and adjacent to conservation areas set out at paragraphs 4.25 to 4.27 and 4.14 to 4.20 in *Planning policy guidance: Planning and the historic environment, PPG 15*, and to other published advice including the guidance of English Heritage on new development in conservation areas set out in *Guidance on the management of conservation areas* at paragraphs 7.6 to 7.10; the relevant, published joint-guidance of English Heritage and CABE set out in *Building in Context: New development in historic areas*; and the relevant, published joint-guidance of the Department of Environment, Transport and the Regions and CABE set out in *By design: Urban design in the planning system: Towards better practice*. In anticipating the consultative role of English Heritage in considering proposals for development of the Commerce Road site insofar as it might affect the setting of the adjacent conservation area, regard also needs to be given to EH's published *Conservation principles, policies and guidance for the sustainable management of the historic environment*.

Should the Council regard the projecting canopies of the two northernmost buildings on the Commerce Road site (Blocks D and E) (which technically fall within the boundary of the conservation area) as making 'a positive contribution to the character or appearance of the conservation area, then proposals for their demolition will be assessed against the same broad criteria as proposals to demolish listed buildings contained in paragraphs 3.16 to 3.19 of *PPG 15*. However, in this unusual situation, where the parts of the buildings that fall within the conservation area, are only very modest parts of those respective buildings, the guidance on the demolition of only part of an existing building contained in Appendix D of *DETR Circular 01/2001- Culture, Media and Sport Circular 01/2001 – Arrangements for handling heritage applications – Notification and directions by the Secretary of State*, needs to be taken into account.

The relevant planning policies that need to be addressed in developing proposals for the Commerce Road site are already identified elsewhere in the draft brief. However, particular attention is drawn to

the definitions for the thirty-eight 'character areas' set out in Appendix 2 of *Brentford Area Action Plan* and specifically to those for Commerce Road and Brentford Lock.

The author of the definition for the Commerce Road area rightly observes that 'much of the industrial activity in this area has receded' and that 'other than the overhanging canopy (sic), the buildings have their backs to the canal', but goes on to suggest that 'the scale of the buildings reflects current and former uses, and by being low-lying (sic) give spatial priority to the water (sic)'.

Interestingly, in relation to the Brentford Lock area whilst referring to the 'heavily urbanised residential development' and observing that 'the scale of the buildings at 4 to 7 storeys is significantly taller than surrounding areas', both of which have been formally approved by the Council in recent years, it suggests by contrast that the buildings in the Commerce Road area 'whilst not dependent on waterborne transport, are still of an appropriate scale and character'. Such a position of inconsistency is seriously open to question.

Given the proximity of the Commerce Road site to the recently completed new residential developments that the Council has approved on the south-west side of the island (Braunston House, Adams Quarter, Moorings House, Jessops Wharf and Corsell House) and to the new hotel and residential developments in the areas on both sides of the canal adjacent to Brentford Locks (all of which lie within the designated conservation area), and the considerable scale of the existing 1960s industrial buildings at the north end of the Commerce Road site (Blocks D and E) (which lie outside the conservation area, except for their projecting canopies), it would be wholly reasonable to encourage new development on the Commerce Road site consistent in height and scale with those of the new developments in the adjacent parts of the conservation area; i.e. generally of four-to-five (residential) storeys, rather than those of the existing single-storey industrial sheds located outside the conservation area. However, it will be important to ensure that the massing and roof-lines of new development on the Commerce Road site should be fragmented in order to relate to the form and scale of the new buildings nearby that fall within the conservation area and to the general character of the other canal-side areas in the historic heart of Brentford. It will be equally important to ensure that the spaces between new buildings and along the canal-side are of a scale and character to ensure that they receive adequate sun-lighting and provide for attractive and safe pedestrian movement and circulation, and effective connections to the Locks area to the south.

The scope to enhance the setting of the Grand Union Canal and Boston Manor Conservation Area

As specifically recognised in the Council's own draft appraisal of the *Grand Union Canal and Boston Manor Conservation Area*:

'The conservation area has many different characters depending on which part of it you are located (sic). The common link is the canal passing through the area of cultivated and naturalistic landscapes, some of particularly scenic and/or ecological character. These vignettes and contrasts are the essence of the slow travelling canal boat and towpath, and some are enjoyed as glimpses, at greater speed, from the tube train and the motorway'.

In relation to that stretch of the canal adjacent to the Commerce Road site, the draft appraisal suggests that:

‘On the west bank, above the towpath is an area of warehousing and works, including a pair which extend into a dramatically over-hanging but now rather desolate canopy end (sic) for boat-repairs (sic). Much of the industrial activity has receded, and at present the scale of the other west-bank buildings reflects current and former uses, and by being low-lying give spatial priority to water (sic). Small-boat and water related activities, for leisure and working purposes, need visual and actual elbow room, a sense of space. The towpath along the basin is used for boat mooring. The buildings of the area, whilst no longer dependent on waterborne transport (sic), are still of an appropriate scale and character’.

As noted above, it is difficult to determine to which ‘buildings of the area’ the author of the appraisal refers, given that the various, visually undistinguished, industrial sheds on the Commerce Road site which back-on to the canal fall outside the conservation area, and those buildings which fall within the conservation area are the substantially scaled new hotel and adjacent residential developments immediately adjacent to the Locks, approved by the Council in recent years. However, the author of the appraisal rightly observes that:

‘On the intervening Island, the former water-industry works (sic) have been superseded by dense housing development of the new century. This is lower at the northern end and has its own small area of naturalistic landscape’.

As noted above, insofar as discerning the present prevailing urban character and appearance of that part of the conservation area along the stretch of the canal between Brentford Bridge (carrying the High Street-London Road across the canal) and Brentford Locks north-westwards to the bridge carrying the South-West Trains railway line across the canal, it may be reasonably argued that it is primarily one of attractive modern housing of appropriate scale and design, with generous residential moorings along the canal itself. Indeed, the once dominant form of the projecting sheds at the north end of the Commerce road site is now seriously compromised in all views northwards along the canal by the considerable height and bulk of the Smith Klein Beecham Headquarters on Great West Road beyond, the development of which was approved by the Council about ten years ago.

Accordingly, in progressing the detailed pointers to the future development of the Commerce Road site as identified in the Inspector’s report into the earlier and rejected development proposals, and shaping new development that will affect the setting of the conservation area, it is the character and appearance of this stretch of the canal as it is today (including its present, primary functional character for residential moorings and leisure boating) and the new canal-side developments adjacent to Brentford Bridge and Locks and on the island directly opposite the Commerce Road site, which should be ‘preserved or enhanced’, rather than that of the various, visually undistinguished and disused industrial sheds on the Commerce Road site which back-on to the canal and fall outside the conservation area. Indeed, the validity of this view is reflected in the Council’s decisions over recent years to accept the loss of the early-to-mid 20th-century, canal-related, industrial buildings on the island that fell within the *Grand Union Canal and Boston Manor Conservation Area* and their replacement with primarily new housing, and by the Council’s approval of the substantially scaled, new residential and hotel developments adjacent to Brentford Locks. However, fundamental to providing new development which will preserve or enhance the setting of the conservation area will be the explicit recognition of the canal-side location of the eastern part of the site and the retention and integration of that limited number of distinctly canal-side features, such as the single-ended dock at the north end of the site and its mooring bollards, that have survived to the present.

Paul Velluet

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