

Brentford

Community Council

Founded in 1989

Mr John Thompson,
John Thompson and Partners
Wren House
43 Hatton Garden,
EC1N 8EL.

Dear Mr Thompson,

Kew Bridge Road (Scottish Widows Site) Pre-Planning Submission Consultations.

In response to your invitation of September 7th 2007 a number of local residents and members of local amenity societies met to see your drawings and to hear your presentation at the meeting you convened on September 18th. That meeting came after a series of earlier meetings, which had considered the evolution of your proposals. September 18th was the first time that your scheme included the site of the Wagon and Horses PH, and it was the first time you released drawings for our consideration.

We are grateful that you have carried out the process of re-design interspersed with these public meetings and that your revised proposals have taken note of many of the objections to the first scheme. That scheme was rejected by the First Secretary of State, following the objections made to it by the representatives of the Local Planning Authority, local residents and the Rule 6 parties.

These include: The omission of buildings on most of the flood plain
The reduction of the overall density
New vehicular access
Partially improved views over the building to the water tower.

While these are all welcomed, we consider that the Local Planning Authority should not consider the changes made, but the acceptability of the scheme you wish to submit to them.

We note that you have convened a further public meeting for September 25th to allow "those who attended the first public meeting to reflect on the proposals".

In order to help that discussion we list below some of our preliminary comments on the proposals presented on September 18th in the hope that they will allow you and your clients the opportunity to amend the design before the application is lodged with the Council.

We are reminded that the inspector, in his report to the First Secretary of State, stated (para 9.90 on page 81) when considering the first scheme that " ..Consequently the considerable harm the proposals would cause to the street scene and surrounding area would not outweigh the benefits of additional housing. In this context I judge that the proposals would not meet the required standard. But this is not any part of London. Rather it is a highly prominent site, seen by many on foot, cycling, on buses and from the river as well as in cars as a highly sensitive site, emphasised by the area's myriad designations"

We consider that the new proposals should be considered against these criteria.

1.00. Family Accommodation.

We have now received your "Scheme Details" which show 42, three bed, (none "affordable"), 112 two bed and 22 1 bed flats.

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We believe that too many of the recent buildings in Brentford are for non-family accommodation.

We look for a scheme on this site where the majority of the units (both for sale and affordable) are suitable for families, provided with private and public amenity and facilities for childrens play in an area of open space deficiency. Clearly this objective has not been achieved.

2.00. Affordable Housing.

We are conscious that too many new built units are beyond the means of many families. There is an urgent need for affordable housing. Your scheme details show that 26% of the flats are "affordable" and 21.7% of the habitable rooms are "affordable"

We believe that this scheme fails to meet the reasons why the first scheme was rejected by the First Secretary of State and fails to meet the currents needs of Brentford.

3.00. Heights

We note that the draft planning brief called for 3 storey development throughout the site and that most of those consulted agreed. The LPA did adopt a higher recommended height (rising to 8 floors + penthouse) in the final brief. However, we believe that the Inspector's report favoured a lower building. He quotes (para 9.85) the EH view on whether the design "mitigated the concern over heights" and concluded that it did not, and that height remained a concern. The present design is too high.

We would ask that the whole building be reduced by at least one floor and more in those parts of the site that most affect the Kew, Kew Bridge and Strand in The Green Conservation Areas.

We understand that the drawings show a floor to floor heights below 2.9m and we ask that realistic heights are shown and that the OD level of all roofs are indicated together with the OD heights of adjacent buildings.

4.00. Density.

The inspector reiterated that density was not itself an objection, but that excessive density could lead to an inappropriate building. In view of the "high prominence" of this site we would ask for a significant reduction in density and height.

We also note that the current proposals concentrate the whole development above the flood plain. It would be helpful to calculate the net density on that part of the site which is to be developed.

5.00. Parking for Residents, Traders and Visitors + CPZ

The "scheme details" show 1,657m² of non-residential space which are additional to the commercially used arches under Kew Bridge.

There appears to be no parking for those working in, servicing or visiting these spaces or for those visiting residents.

In addition no parking is shown for vehicles and trailers using the pontoon.

We request that proper allocation for non-residential parking on site is included.

Additionally only a proportion of the residents will be able to park on site. We think that an extensive CPZ covering Green Dragon Lane and Strand on the Green would be necessary.

We ask that consultation with local residents on a CPZ should be undertaken before any planning consent is given.

We note that at the recent PLI at Commerce Road the applicant agreed that every flat should have at least one cycle stand on site.

We consider that cycle provision is not adequate on this site nor is it planned so that it can be regularly used at rush hours.

6.00. Access.

We regret that earlier proposals to improve the setting and design of the Kew Bridge road junction have not been included in this scheme.

We regret that all site traffic is not accessed through the Thames Side Centre site. We would ask the Council to promote a common access for all traffic to both sites.

We consider that the proposed forecourt to Kew Bridge Road is an uneasy compromise.

We are not clear how traffic from Brentford can enter the site, as no filter lane is shown. Similarly we are not clear how traffic leaving the site to turn east can cross the central reservation. Are signal controls being proposed?

7.00. Building Impact: Kew Bridge Road frontage.

The frontage to Kew Bridge Road has been extended to include the Wagon and Horses PH site. This gives a very long frontage, which, combined with the height, the formal set back and the emphasis on the height of the central block, will ensure that the design appears as a very monumental building not addressed to any formal urban space.

We consider that the effect is out of scale with its setting and that it should be re-designed to present a more informal appearance.

8.00. Building Impact: Kew Bridge frontage.

We note that the Inspector's report considered this elevation in detail and pointed out that its present setting is spacious around the bridge approaches on both sides of the bridge and both sides of the river.

The proximity and size of this proposal would, like its predecessor, interfere with with the setting of the bridge. It is too large and too close to the bridge.

We are pleased to note that the arches of Kew Bridge will not be concealed by the building and that the total frontage to Kew Bridge is shorter. We note that the Inspector's report considered this elevation in detail.....

There is an important corner view when the site is approached from Chiswick roundabout. From this view not only will the monumental facade to Kew Bridge Road and the facade to Kew Bridge be read together, but the rising roof lines reaching to approximately 9/10 floors at the centre of the site will reinforce the monumental quality of the building.

9.00. Views of the Water Tower.

Early studies suggested that the site development would be made up of clusters of buildings, allowing a clear view of the Grade 1 listed water tower from Strand on the Green.

This has only been partly achieved in the present scheme, which gives more limited views over the roofs. We request an amendment to improve the views of the water tower.

10.00. Building Impact Thames Frontage.

We are concerned about the quality of the view of the site directly across the Thames. The Thames Landscape Strategy (Hampton to Kew) specifically calls for “no more high flat roofed buildings facing the river”.

By crowning the glass drums on the skyline with flat roofs an opportunity to diversify the skyline has been lost.

We are also concerned at the light pollution from these drums and would ask if they are retained that light sensor operated light switches and curtain controls be installed.

We understood that one public house would be sited on the river to accord with the brief which did not then include the Wagon and Horses PH.

There appears to be still only one public house. We also note that this building has not been fully designed.

The Planning Brief calls for a boat house on site.

While we welcome the limited off site provision for boating in the arches we request that a replacement boathouse and club house is provided on site as stipulated in the brief.

11.00. Building Impact: Skyline.

We have already asked for a reduction of one floor throughout the scheme. This change would enable a more domestic design to be developed.

Additionally, we consider that the glass drum on the corner and the higher glass drum at the centre of the building are out of character.

This feature was better handled in Edwardian Mansion flats, and although we are not looking for an historic image, we do think the design of these features should be reconsidered.

We note that no fenced amenity spaces are allocated at ground level and we wish to have confirmation that there will be no tennis court type fencing to any roof terrace.

12.00. Water Side Design.

We endorse the detailed observations of the West London River Group,

We ask that the tow path should be widened to at least 3 meters and that a connection is formed between the public house terrace and the high level open space on the Thames Side Centre site. We also request that proper provision is made for launching boats from the pontoon and for parking boat trailers.

13.00. Landscape Design.

We ask that the line of tree planting along Kew Bridge Road should be strengthened and should include mature evergreen and deciduous trees.

While noting the reported views of the GLA on amenity space we are concerned that no provision is made for play on site by children in different age groups. This is particularly important in view of the need to accommodate growing families in an area of open space deficiency, which is cut off from play areas by major roads.

We understand that play areas on roof terraces with high fencing are expressly excluded and we would support this restriction.

We regret that toilet facilities on site are not included. This site is intended to be a magnet for visitors who should not have to rely on private toilets within the PH.

We note that the road by Kew Bridge will need to be closed to traffic except for occasional servicing and for boats towing trailers towards the pontoon and we look for detail proposals.

14.00. Summary.

We felt it would be helpful to send you these preliminary comments at this stage. They nearly all reflect the views given at the inquiry and endorsed in the Inspector's report.

We hope you will have an opportunity to amend the scheme and to re-consult before the application is lodged.

15.00. Consultation Arrangements:

We would ask you to include this letter in your report to the LPA on pre-application consultations.

As this is such a critical site we request that the views of English Heritage, and CABI be sought.

This letter has been written after consultation with the West London River Group, The Kew Society, The Green Dragon Lane Residents Association, The Strand on the Green Association, The Environment Trust, Richmond on Thames, The Thames Landscape Strategy CAG, and the Brentford Waterside Forum.

Yours sincerely

cc St Georges, West London Ltd, John Thompson and Partners, West London River Group, Kew Society, Strand on the Green Residents Association, Thames Landscape Strategy, (Hampton Court/Kew), CAG, Environment Trust Richmond on Thames, The Green Dragon Residents Association, Hounslow Planning Department and Ward members.

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Chairman, Planning Consultative Committee
Brentford Community Council.