

To Marilyn Smith,
Department of Environmental Planning
Civic Centre Hounslow by email.
Copy to Mr Kim Gottlieb,
The applicant by email.

from Denis Browne, Chairman,
Planning Consultative Committee,
Brentford Community Council
Chatham House, 15 The Butts,
Brentford TW8 8BJ. By email.

Ref: BCC 492 dmb
November 24rd 2009.

Dear Marilyn,

**Observations adopted by the Planning Consultative Committee
On proposal to build an office/advertising building adjacent
to Chiswick Roundabout on Larch Avenue.**

The Planning Consultative Committee received a presentation of the scheme to build an office/advertisement feature structure west of Chiswick Roundabout on November 18 2009 and adopted the following preliminary views:

I would be grateful if you can include these views in your reports to members.

1. History

1.01. We were reminded that the application site was occupied by a 2 floor National Westminster Bank building until the site was purchased by London and Bath and the building was demolished.

1.02. Various applications have been made for high rise office, residential and advertisement feature buildings/structures. All have been refused except for the application for a 52m high office building which has not been started.

1.03. The applicant considered that the approved scheme was not viable and there was no current proposal to proceed.

1.04. The BCC has considered each of these applications and has asked the Council to reject all of them,

1.05 From the point of view of the Brentford community there is no imperative to develop this site

2, Visibility.

2.01. The site is next to the Chiswick roundabout, which is the intersection of the North Circular Road and the M4/A4 corridor. It can therefore be seen from a considerable distance both from the M4 motorway, the A roads and from open spaces, and the public realm, including conservation areas and the approach to the Royal Botanic Gardens at Kew, which is a World Heritage site.

2.02. At 52 meters (equivalent to 12/15 storeys) with an unusual shape and displaying illuminated images on two faces it is intended to be a highly visible "landmark feature".

2.03. The BCC considers that landmark features should not necessarily be located at the junction of major roads. Where they are suitable, it would be more appropriate for landmarks to mark the focal points of community life.

We also do not accept that landmarks should necessarily be high buildings.

3. Height.

3.01. The Design and Access Statement (page 12) illustrates the High Buildings in Brentford.

3.02. The BCC has asked and now repeats our request that the Council adopts a High Building Policy with Maps to guide development. Without it there is a possibility that precedence will be relied on when applications for further high buildings are considered..

3.03. This application attempts to show that high buildings are acceptable on and both east and west of the site. They argue that the slender Grade 1 listed Steam Museum tower is a precedent for high buildings.

3.04. Reference is also made to Vantage West. This building was originally built several decades ago as low grade offices for a Civil Engineering company. Unfortunately the newer façade, which is on the axis of Kew Bridge, is a highly visible and highly undesirable precedent for high rise development in this area.

3.05. Furthermore the application, which is for a high structure, has been designed to stand alone. If it were to become the precedent for other high buildings in the vicinity much of its intended impact would be lost.

3.06. The BAAP does not include a High buildings policy, In practice recent high building applications close to the A4/Boston Manor Road junction have been accepted and few other high buildings applications have been allowed.

3.07. The one exception has been the 85m tower to the Barratt development ,which was clearly designed to be a single feature and not a precedent for a cluster of towers.

3.08. We consider that if this consent were granted the case for other applications around Chiswick roundabout and on sites towards Boston Manor Road and towards Gunnersbury Station could be strengthened.

3.09. We note hate that a number of buildings between the site and Power Road could be redeveloped creating a proliferation of potentially tall buildings.

3.10. The BCC consider that until the Council adopts a plan-based High Buildings Policy for Brentford no applications over 4/5 storeys should be approved outside existing clusters.

4. Concept. (Advertisement Feature)

4.01. The Design and Access Statement (page 16) explains the need to supplement the office content to improve viability. It does not state that the A4/M4 corridor is one of the most lucrative advertising sites in London.

4.02. The BCC has supported the Council in refusing and defending appeals on several advertisement sites on the A4/M4 corridor.

4.03. The BCC urges the Council to formulate a policy for advertisements in Brentford as an addition to the BAAP. The policy should define the location and character of advertisements suitable for an urban motorway AND for the residential character of much of Brentford. Before this policy is in place we urge the Council to continue to refuse advertisement applications out of keeping with the residential character.

5. Media Screens.

5.01 We understand that it is intended that the media screens will be lit all day and all night.

5.02. It is clear from the sketch (DAS page 19) that the illuminated features are equal to 5 or more storeys in height and will be displayed to catch the attention of motorists, passers by and residents. Whether or not it is safe to distract drivers it is also certain that local residents will not be able to escape from this dominant feature.

5.03. The BCC considers that the advertisement screens are inappropriate for this site, too large and too distracting and that they will tend to debase Brentford as a residential area at a time when new investment in high quality housing is needed.

5.04. We also consider that the approval of a major advertising feature on this site will make it *harder for the Council to resist intensive advertising both on the A4/M4 corridor and in West Chiswick.*

6. Access, Circulation and Parking..

6.01 The office entrance on the east side is reached by the pedestrian crossing to the North Circular Road. There is no crossing across Larch Road. As a result the site is detached from the public realm.

6.02. The pavements have been widened, which is welcome, but no active use of any of the frontages is planned. These pavements will be dead and perhaps dangerous areas. As there is high crime rate on the A4 the advice of the Police should be sought..

6.03 The parking layout does not use up all the space allowing more vehicles in at a later date. Cycles are parked away from the core. Access to lifts is mean.

6.04. The BCC suggests that access and connections should be reviewed so that the development was more tightly planned to connect the office uses with their *urban context.*

7. Office Accommodation.

7.01. It appears that the office accommodation has been primarily included so that the application is not solely an advertisement application.

7.02. The design of the offices sits awkwardly within the mesh cage through which it can be seen.

7.03. The BCC considers that that the design needs to be revised to better integrate the office accommodation with the rest of the structure so that they are more compatible in all conditions.

8. Design

8.01 Many BCC members welcomed the innovative approach of the design. Often the buildings proposed in Brentford have been of poor quality and supporters of this design considered that its sculptural quality was an asset.

8.02. Should the Council wish to approve this application despite the comments set out in paragraphs 1/7 above, we would recommend that the design is reviewed to include the following changes:

- (i) That the area of the car park should be reduced.
- (ii) That wider pavements with street trees should be introduced.
- (iii) That active uses should be included on the pavement frontages.
- (iv) That further pedestrian crossings be provided.
- (v) That the height of the garage should be reduced to 4m or less, lowering the offices and the whole building.
- (vi) That the building **be reduced in height to approximately 20m.**
- (vii) That the junctions between the mesh skin and the horizontal windows be reviewed so that the junctions are reconciled by day and at night.
- (viii) That the junctions between the edges of the two illuminated screens and the un-lit mesh are reviewed so that the three dimensional character of the structure is reconciled with the flat advertisements.

8.03. The BCC considers that the design approach mitigates to some extent the basic planning objections to this building. If the design improvements set out above were carried out it would tend to make the application more acceptable.

9. Community Benefit.

9.01 Overall we do not consider that this application **offers any sustainable benefit** to our community.

9.02 Apart from the construction period, it offers no economic advantage. and in our view, it sets out to provide an inappropriate "landmark" designed to catch the attention of motorists and not to provide an iconic building in the heart of our community.

9.03 It therefore appears that any local benefit would need to be financial and we would suggest that if the Council were minded to grant a consent for development on this site it should be the basis for a substantial financial contribution. The most appropriate beneficiaries would be Gunnersbury Park, which needs capital funds for restoration and revenue funds for future maintenance.

I would be grateful if you can include these views in your report to members

Yours sincerely

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council.

cc. London Forum
Royal Botanic Gardens, Kew.
Gunnersbury and West Chiswick Society

Mr K Gottlieb, Applicant.
West London River Group
Strand on the Green Association
Kew Society

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Wording in red corresponds to our letter BCC 504 dated March 15 2010.