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REVISED DRAFT

Ref BCC 563 dmb
020 8560 7548
December 2 2011

Dear Sir,

**Reynard Mills Trading Estate,
Revised Application (November 2011)
for Residential Development.**

On July 6 2011 I wrote to you on the instruction of the Planning Consultative Committee of the Brentford Community Council (ref: BCC 542,) following the presentation you made to the committee.

In that letter we requested that you withdraw your original application and we are pleased to note that this has been done.

We also offered "a collaborative approach" to try to ensure that a sustainable scheme could be developed which would be acceptable to local residents.

Unfortunately this has not been done. There has been no further meeting with you and the new application has been lodged without any further consultation with us.

The Planning Consultative Committee has, therefore, reviewed the current design against the criteria we set out in BCC 542 and have concluded that although an improvement on the abandoned scheme the new proposals do not present the best use for the site and should therefore be deferred for further negotiation.

In order to speed up this process we are sending you our first reactions to this scheme now. We would also like to renew our invitation to you to attend our meeting on January 12 to discuss this letter and any changes you decide to make to your application in response.

We set out below the reasons why we ask the Council NOT to approve this scheme unless it is suitably modified:

1. Loss of Employment.

The development would remove a further 2.5 hectares of land zoned for employment. The Council is already concerned at the loss of employment land in the borough and is undertaking a review, which is not expected to be complete for some months. A decision to allocate this site to housing before then would be premature.

2. Employment in Brentford.

The loss of employment sites in Brentford is particularly severe. Consent has already been given for mixed development at Commerce Road and at Kew Campus for two 'employment' sites.

3. The Brentford Action Plan. Land Uses.

The Council has adopted the Brentford Action Area Plan, which, with the (now draft) Core Strategy will form the Local Development Framework for this area. This site is not included in the BAAP as an area for planned change.

The BAAP was prepared in parallel with the Employment DPD and the allocation of land uses within it resulted from extensive consultation and a balanced assessment of the employment needs of the area.

It should be emphasised that the BAAP does NOT zone the Reynard Mills site for a change of use from employment to residential.

A major reduction in Employment generating land area such as that now proposed should only be made after a similarly competent consultation of employment needs, not just for this site, but for the whole area, was completed.

4. Marketing.

We were advised at our earlier meeting with you that you had marketed the vacant parts of the site, which are mostly occupied by obsolete buildings, It is understood that the site was not marketed as a whole to secure commercial redevelopment.

The successful letting of the recently constructed commercial units on the south west corner of the site indicates that there is continuing demand for employment uses on this site, providing the commercial accommodation is either refurbished or replaced by modern units.

We also note that the potential for mixed work=live units has neither been considered nor tested.

As this is an established employment site in which the more modern units have been successfully let the BCC would ask the council to object to a change of use.

5. Infra Structure.

When the first scheme was presented the BCC considered whether a residential development site additional to those shown in the BAAP would have the necessary infra-structure in view of our present deficiencies and concluded that there might be no present capacity for additional large residential developments in Brentford.

Since then pre-application discussions on plans for the Brentford Town Centre have started. It now appears likely that that site will accommodate twice the number of units previously anticipated, it is still too early to say whether any of the increasing infra-structure deficiencies will be met on that site.

It is therefore even more unlikely that there is capacity for significant additional residential development in Brentford.

6. Education.

There is already extreme pressure on all local schools. This pressure will increase when further housing schemes which have been granted planning permission, but which have not yet been built, are occupied.

Council policies seek more family accommodation to redress the present imbalance between small and large units. (See paragraph 8, below). If this objective is achieved it will still further increase the need for school places.

We note that the application site is between and alongside both a heavily over-subscribed single form entry primary school, a secondary school and a university campus.

The BCC considers that if this site is not retained as an employment site it should be reserved for educational use and in particular accommodate the physical expansion of the adjoining schools..

7. Height and Massing.

This application is for residential uses and so the following paragraphs refer:

The scheme has been changed to marginally reduce the impact of some of the high buildings. These minor changes are welcome, but fail to meet the widespread concerns of the surrounding residents

We note that the heights and footprints of the tallest northern and central tower blocks are unchanged.

The introduction of six and seven floor flats, to be built on partially raised ground, is inconsistent with the character of the area and with BAAP policies.

The relevant area descriptions are set out as:

7. **Great West Road/Windmill Road Junction.** This area consists of residential streets from different periods united by their largely domestic use, as well as the impact of the Great West Road and related commercial buildings on their residential amenity. The character area also provides the only domestic scale buildings that front directly onto the Great West Road. The townscape itself has the sense of an area that has been interrupted and overwhelmed by the major roadway at its centre. Much of the housing is late Victorian and Edwardian arranged in long terraces, but there has also been a significant amount of infill development since the mid twentieth century including the introduction of a trading estate.
8. **Ealing Road North.** This area is characterised by a mixture of two storey Edwardian and interwar housing with a small amount of infill development. The area provides an attractive residential environment interspersed with local amenities. The residential scale this area contrasts significantly with commercial developments on The Great West Road.

The text for Area 7 describes two areas of height and massing; the commercial zone facing into and directly adjoining the A4, and low rise housing further from the A4 which is "Victorian and Edwardian arranged in

long terraces” The proposal site is located beyond the high rise frontages facing the A4 and is located within the low rise residential neighbourhoods

Having regard to the location of the site (distant from the A4) and the scale of the existing development on its boundaries (none over four storeys) the site clearly should be judged against the character of the residential housing. A comparison with the description of character area 8 reinforces this.

The urban design of this proposal is therefore NOT in keeping with the surrounding character area.

The BCC requests that the proposal is NOT approved until it can be demonstrated that a sustainable development consistent with the established grain of the area and the BAAP policies cannot be provided.

9. Accommodation Mix.

We note that out of 275 units proposed only 83 are to be “family units”. It appears that more of the terrace units could be allocated to larger units including additional town houses.

Brentford has a surplus of small flats many of which are un-let or rented on short leases. Many other approved schemes which include a lot of small units have not been built, because of reduced demand and financial problems.

We draw your attention to policy H.4.1. of the draft Hounslow LDF Core Strategy, which states:

“The Council wishes to prioritise the delivery of family sized accommodation (three or more bedrooms)”

If residential development was accepted on this site the majority of the housing units should be for family accommodation.

10. Affordable Housing.

We cannot identify in the new application either the number or the location of each type of unit that will be allocated for affordable housing and would be grateful if you can provide us with this information.

We also note that the “Affordable Housing Viability Assessment” that is referred to in paragraph 5.37 of the Planning Statement is not available on the Council’s web site and we would be grateful if you could forward us a copy.

11. Character and Design.

The design indicated for the proposed higher buildings is not suitable in the Windmill Road area. There is not enough information to understand the proposals for the terraces and we would request that consent was not given to an OUTLINE application as the success of the design will depend on detail.

12. Overlooking.

We note that the new application introduces terrace housing in place of the former tower block alongside the boundary with St Faith's hall and vicarage.

We would therefore be grateful for your explanation as to why similar terraced housing has NOT been introduced along the western boundary of the site, where there would be extensive overlooking and over-shadowing by the proposed tower blocks of the adjoining low rise residential housing in Manor Vale and the primary school.

13. Special Housing.

If a residential use is permitted we consider that a substantial part of the site should be reserved for old people. Studies show an accelerating increase of elderly people in Brentford, which is expected to increase further.

The best sites for the elderly are those where they can walk into local shops or those on bus routes. Sites where it is difficult to accommodate high car ownership are particularly suitable. (See paragraph 13 below).

We note that policy H.4.1 of the draft Hounslow LDF Core Strategy also states:

“It is suggested that a target is set for new homes for older persons”

We consider that a residential development of this size should include an old people's home and sheltered housing. This site is particularly suitable for older people.

14. Traffic and Parking.

Windmill Road is already subject to considerable transport pressures that often result in congestion. It is a double-decker bus route. Wide vehicles find it hard to move between the lines of parked cars. With so many residential

properties on Windmill Road it would create hardship to ban on street parking in the area.

The majority of the proposed housing in the scheme is likely to be for market sale. New residents will expect generous on site parking and there is no capacity for residents on this site to park on local streets without further affecting existing residents,

We would ask the Council to consider requiring that new residents are not eligible for local parking permits.

In addition TfL will require 1/ 1.5 cycle spaces per unit.

The two narrow junctions , both leading onto an already congested Windmill Road, are likely to be further clogged by many of the (up to) 350 cycles and 200+ cars on site.

In our view the number and mix of vehicles on this site would add to the present congestion on Windmill Road and will lead to rat running through the side streets between Windmill Road and South Ealing Road.

15. Precedent.

We are concerned that this application could be a precedent for further sites in the area. We would object to any proposal which could become a precedent for further loss of employment, for the under-provision of schools or of accommodation for the elderly or for over-dense development.

16. Conclusion.

For all these reasons we urge you to modify the scheme further and we invite you to present your revised proposals to us on January 12 to reconvene the discussion on your approach, which we believe should have taken place after you withdrew your first scheme.

Yours faithfully

Copies to Nicholas Smith
Local Residents,
BCC web site.

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council