

Denis Browne, Chairman  
Chatham House  
15 The Butts  
Brentford TW8 8BJ

Ian George  
"Your Shout"  
By e mail.

Ref: BCC 746.  
Oct 22 2015

Dear Mr George,

**Pre-Application Consultation: Views adopted by BCC.  
As at October 12 2015.  
Proposed Chiswick Roundabout Tower.**

We would like to thank you and your team for presenting your emerging scheme to us on October 12<sup>th</sup> 2015. After extensive discussion the committee appointed a group of its members to send you our views on the scheme as it was presented to us.

We note that you did not amend your scheme before it was put on public exhibition so that the text we sent exclusively to you on October 18<sup>th</sup> is now on wider circulation and has been posted on the BCC website.

**1. Access and Servicing**

Before considering the merits of this scheme we have looked at the problems of connecting this site to Brentford and Chiswick, and serving it without further disrupting traffic flows.

As the paper states (page 3) this is an isolated site and we do not believe that 1200 people can enter and leave the site daily at street level without disrupting the traffic. (Page 4) Access for the 100 cars parked on the site and service vehicles would present further disruption.

If the application does proceed it will require a multi level solution to provide easy access for pedestrians, services and parking which do not impede traffic flows.

**2. Urban Framework (page 1)**

This drawing shows the proposal in the context of a plan which the Hounslow Planning department are considering. It may be put forward for consultation, inquiry and adoption but this has not yet happened so it is not possible to rely on it as a realistic context.

### **3. Precedent for Other Development**

While we appreciate that all applications are “judged on their merit” it is also widely recognised that it is difficult to successfully defend the refusal of an application at appeal where it follows local precedents.

There can be no confidence that this application, if approved would always be the pinnacle of the Golden Mile developments.

### **4. Facilities and Infra Structure**

Housing has been built in Brentford faster than the supporting infrastructure. On this isolated site there appears to have been no thought how the 800 residents will get to shops, doctors schools etc.

### **5. Density**

The scheme is massively over dense. This has led to failures to meet standards for amenity space standards, overlooking distances, parking provision, sunlight and daylight which are considered below.

### **6. Quality of Life for Residents**

Brentford needs family homes, 50% affordable, in mixed communities with easy access to all the facilities they need. This scheme proposes 312 with few facilities on site or nearby.

### **7. High Building Policies**

The Local Plan identifies in broad terms the preferred locations for high buildings (more than 6 floors and/or significantly taller than adjacent buildings) but it does not show a specific strategy for tall buildings in East Brentford. It would be inappropriate to agree to a building of 32 floors on this site until there is an adopted Local Plan or consent (like that applying to the Brentford Football Club outline consent) specifies maximum heights for the surrounding buildings.

### **8. Mass and Height and Profile**

The mass, height and profiles of landmark buildings should be judged on grey days from ALL angles. Pages 4,5,7,8,9,18 and 19 all show views from the SE leaving only p16 to show another view. Despite the use of light reflective materials the building is likely to dominate the skyline from many parts of west London.

## **9. Impact on World Heritage Site at Kew**

We have yet to see computer generated images to show the impact on Kew Gardens. Since Kew was designated a World Heritage site there have been frequent intimations that if high building continued near the "buffer zone" in Hounslow it might lose that precious designation.

## **10. Impact on Conservation Areas**

The application site is surrounded by designated Conservation Areas mostly consisting of low rise residential buildings. The proposed building is likely to be visible from many points inside these conservation areas and by virtue of its non-domestic scale would clearly cause harm.

There are already examples in Brentford where tall buildings have caused harm to distant conservation areas or Historic landscapes. One example is the view of the Great West Quarter 22 floor tower from Syon Park.

It is likely that the impact of this building would effect the quality of protected areas many miles from the site.

## **11. Planning for The immediate Context**

The inspector at the Kew Bridge PLI ruled that the impact of a new building on its immediate surroundings was a serious indicator of over-development. Clearly the impact on buildings south and east of Chiswick High Road would be over-powering.

## **12. Facilities for Small Office Units**

We welcome the provision of small office units with effective back-up and good communications. However the site is not close to Kew or Gunnersbury station nor will the offices have many of the 100 on site parking bays which have also to provide for the 312 flats. We think this type of provision should be in a town centre site with a high PTal.

## **13. Provision of Residential Accommodation**

The typical floor plan (page 17) appears to show 1 3br, (10%) 2 2br (20%) and 7 1br (70%) flats. This mix will not meet the need for family housing. As the Council has not been happy to support residential development on the A4 sites perhaps the absence of family homes on this site is appropriate. A scheme with no residential accommodation would be preferable.

As the area is highly polluted both from noise and air quality, which is the worst in the borough, the site should be reserved for commercial development.

In the event that residential cannot be avoided the pressing need is for affordable flats for at least half the development to compensate for those developments (at Commerce Road, Brentford Town Centre and the Stadium site) which have little or no affordable housing.

#### **14. Private and Community Amenity Space**

Hounslow is a suburban borough where residents expect to have at least part of their amenity space on site out of doors. The Council require 5-7m<sup>2</sup> private amenity space plus 25m<sup>2</sup> of communal space per dwelling. This proposal offers only enclosed winter garden balconies or a covered community space. This proposal does not meet the required standards. The communal amenity is in the most polluted area of the borough.

#### **15. Privacy**

The space between parallel 2 floor terrace houses should be 21m, in this scheme the two parallel wings, rising to about 24 floors are only 12m apart. All the rooms in the 3 BR single aspect flats are denied privacy as the glazed public access corridor on the other wing has direct views into all the rooms. This is not acceptable.

#### **16. Sunlight and Daylight**

The atrium faces SE so it will only enjoy sunshine early in the day. Most of the 312 flats are single aspect and many face only north or east. We have not yet seen projections of the shadows which would be cast by this tower on nearby buildings and public spaces.

#### **17. Turbulence**

There is a long history of unusable public spaces which have been created close to tall buildings. It has yet to be demonstrated that turbulence will not be a problem here.

## **18. Parking Impact**

Until all Hounslow streets are in well enforced CPZs there will always be pressure on street parking from each new development. This scheme will have only 100 parking spaces, shared by about 800 residents in 312 flats, 400 office workers and those who service the building. This will clearly not meet the demand. Any consent should include an enforceable restriction to prevent residents in this building from parking on adjacent streets.

## **19. Public Transport**

Your document does not give the PTaL. It may be about 3. The scheme would be served by bus services, which do not run at frequent intervals, by Kew Bridge station, giving access to Hounslow and Waterloo. These trains are already full at peak times. Also by Gunnersbury where TfL do not own enough land to improve an over-used station. The addition of 910 flats and a 20,000 seat stadium will add to these pressures.

## **20. Highway Movement**

The site is correctly described (page 3) as an "isolated island". This isolation may have been the reason why the National Westminster closed its 2 storey bank many years ago. The proposals (pages 4 and 5) to link the site across the North Circular Road and the A4 with pedestrian crossings, which will be the only access for the 400 office workers and the 800 residents will inevitably affect the traffic flows on the Chiswick roundabout and will increase the delays there and at Kew Bridge. These areas are already grid-locked at peak times even before the 910 BFC flats and the 20,000 stadium fans become part of the problem.

## **21. Summary and Conclusion**

**We conclude that this is an isolated site, which has not been developed over many years because investors appreciate that it is a poor development location.**

**Only when comprehensive multi-level access and servicing proposals have been incorporated in this scheme and when the Council have adopted a comprehensive master plan which has been subjected to consultation and inquiry and has been approved by the Secretary of State will the true potential be realisable.**

**We consider that the innovative approach to the design could lead to an interesting development in a central London or Docklands site, but that it would be one which was inappropriate here.**

**We believe that the brief should be reviewed and that it should then be possible for a more modest commercial development to be welcomed on this site, which would not harm the Conservation Areas, the World Heritage site or the setting of listed buildings.**

**In that context we would welcome the innovative ideas which are displayed in your preliminary proposals.**

We would like to thank you for involving the BCC in this review of your emerging design. We hope that these comments will help you with your work in developing your preliminary proposals.

Yours sincerely

Denis Browne  
Chairman, Planning Consultative Committee  
Brentford Community Council

Cc: Shane Baker and Marilyn Smith Hounslow DC.  
Members of the Isleworth and Brentford Forum  
Members of the Planning Committee  
Local Amenity Societies.