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Amelie.Trepass.  
"Your Shout"  
by e mail

**FINAL DRAFT**  
November.19 2015  
ref: BCC 752

Dear Amelie,

**Pre-Application Consultation: views adopted by BCC  
As at November 9 2015  
Proposed Mixed Development, Capital Exchange Way.**

We would like to thank you and your team for presenting your emerging scheme to us on November 9th 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 appreciate that you have still a lot of design work to do before a detailed planning application can be lodged, but we hope these comments will assist in that process.

**Paragraphs 1 to 3.09** below summarise the information you gave us about the scheme. This has been recorded as there was no complete description of the proposals available when we met.

**Paragraphs 4 to 23** below set out the comments and recommendations which the BCC ask you to adopt.

**Scheme Description**

**1. The scheme.**

You advised us that the scheme would be built on a 6,000 m2 site. That it would include: A data store (sub basement), garaging for 124 residents cars and for bus drivers but not for offices or visitors (basement) garaging for 92 buses + bus repair bays (ground/first floor levels), park/amenity space 4,000 m2 partly covered by buildings (second floor level), car show room (second to fifth floor levels) cafe and offices in pods (second to fifth floor), and 350 equally divided into 1BR,2BR,3BR flats in 3 towers (second to nineteenth levels).

You left us with a Draft set of drawings and showed a model.

## **2. Planning Context.**

Since the meeting we have had confirmation that work on the preparation of the Supplementary Plan for the Great West Road, which is intended to be the context for this and other schemes will start in December 2015. It is anticipated that the Plan could be adopted about December 2017.

It was clear that Hounslow have not been able to give you a clear and comprehensive picture of the planning context for this scheme.

### **3.01. The Brief.**

You advised us that your essential brief was to provide **a bus garage** and that other elements have been added by your client to improve viability.

**3.02.** The other elements include a **Data Store** which you told us was much in demand and would provide a valuable heat source. It was not clear whether it would be necessary to provide a back up boiler facility.

**3.03. Garaging** has been limited by advice from Hounslow. We are concerned that offices without parking may not be attractive. On-street parking nearby is not likely to be possible. Similarly parking for the extensive car show room may be needed.

We are also concerned that less than half the 117 3BR and 117 2BR flats will have parking on site and that no parking would be provided for the iBR flats. It will be necessary for residents to undertake not to park in adjacent CPZs.

**3.04. The Bus Garage** and repair facility will be welcome. You advised that existing bus routes would not be altered and that buses would only come to the garage when they went out of service. This arrangement would ensure that traffic congestion in this area would not impede their movements. However, it may produce noise problems late at night and early in the morning which will be unacceptable if residents do not keep their windows shut.

**3.05. Facilities.** The proposed cafe would be welcome, but we were surprised that no space has been included for local shops, a doctor's surgery a gym or health centre or a creche. The site is relatively isolated from these facilities and we do not know if they may be provided on adjacent sites.

**3.06. Amenity Space.** The main amenity for workers and residents will be Gunnersbury Park. Unfortunately the park can only be reached by crossing the dual carriageway A4 at grade. Traffic can travel up to 40mph on 3 lanes. Even at controlled crossings the route is unsafe for unaccompanied small children and would pose unacceptable risks for many older children.

As there are no balconies or play spaces for under fives the amenity space on site appears not meet the standards in the London Plan.

**3.07. Car Show Room.** You advised us that the car show room would not include facilities to repair cars.

**3.08. Offices.** You did not show us detail plans for the offices. Providing them in self contained units may be attractive, but your design does not allow new businesses to grow without moving.

**3.09. Residential.** You advised us that up to 350 flats would be provided in three conical towers. There would be equal numbers of 1,2 and 3 BR flats. Assuming that one bedroom would be single in each type, this would equate to: 234 + 351 + 585 bed spaces = 1170.

## **BCC Comments and Recommendations**

### **4.00 Urban Framework.**

As the area plan is not complete it is not possible to see how the buildings on this site will relate to adjacent sites nor how the urban spaces and urban landscape can be developed.

We appreciate that a lot of original thinking has gone into this design. In order to achieve the impact desired it is important to ensure that adjacent buildings are designed to complement each other.

***With such high density development each building should contribute to a contextual urban framework.***

### **5. Precedent.**

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 on appeal where it follows local precedents.

***There can be no confidence that this application, if approved, would not constitute a precedent for other individualistic designs which did not contribute to an integrated solution for the area.***

## **6. Facilities and Infrastructure.**

Housing is being built faster than the supporting infrastructure in Brentford. Accommodation for 1170 people are proposed on this site. Additional residential for BFC (910 units=2275 people) Chiswick Tower (312 units= 780 people) plus further development at Wheatstone House and on the Starbone and B and Q sites will produce well over 4225 people for whom no firm provision has been made.

***It is essential to earmark sites and bring forward development for schools, local open space, shops, surgeries, creches, gyms and other facilities so that new residents can enjoy all the amenities of urban life when they move in.***

## **7. Density.**

This scheme is massively over-dense. We have not been told what the PTaL. It could be about 3 or 4 which suggests that a scheme with far less development would be appropriate.

***It is a sign of excessive density that it proposes single aspect flats looking north and looking directly into the M4 motorway.***

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

The BCC has consistently opposed residential development on the A4/M4 corridor. In other mixed development schemes commercial buildings are sited close to the road with lower residential units planned behind them.

***The BCC would prefer to see a wholly non-residential scheme. If this is not possible the design should be amended to exclude residential units from the north tower.***

## **9. 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 grant planning consent to buildings of considerable mass over 19 floors in height until there is an adopted supplementary Local Plan for the area.***

#### **10. Mass Height and Profile.**

The originality of this design was admired, but it was much regretted that the design skill was being used to squeeze far too much development onto a small site (0.6 hectares).

Seen from the south along Capital Exchange Way the view includes both the two tower blocks which are part of the BFC scheme and the 3 proposed towers rising to 19 floors on this site. From this angle all the buildings will merge into a single wall of massive development.

***The scheme should be reviewed to reduce the footprint of the 3 residential towers.***

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

We have yet to receive any information on the precise impact of this scheme on the World Heritage site at Kew. It is clear that as many visitors will come by train to Kew Bridge Station it will effect the impression they receive of this area.

***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.***

#### **12. Impact on Conservation Areas and on the Immediate context.**

As plan 0.4 of your presentation document shows, the site is surrounded by Conservation Areas. Most of these are open like Gunnersbury Park or consist of low rise residential buildings. The proposed structures are 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 locations 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 together with the high flats on the BFC sites will cause unacceptable harm.***

### **13. Facilities for Small Offices.**

The inclusion of offices is welcomed. It is understood that they are intended for small start up firms.

***We are concerned that the offices are designed so that a successful enterprise cannot expand without moving, that they are so far from the street and that there is no provision for workers or visitors to park.***

### **14. Facilities for Car Showrooms.**

We welcome the inclusion of a car showroom, its innovative design and its location close to the A4. We note that no repairs or servicing will be done on site.

***We are concerned that there is no provision for parking for workers or visitors.***

### **15. Provision of Residential Accommodation.**

The design information of the residential towers is so incomplete that it is difficult to make constructive comments at this stage. The plan at every level will differ in each tower, which will require detail plans to demonstrate that all 350 flats will conform to London Plan standards.

On the basis of the 10th floor plan (in the brochure) it would appear that:

The south tower will house 11 units in each floor off one core.

The central tower will house 8 " " " "

The north tower will house 21 " " " "

Of the 40 single units on each floor 17 will face north.

We were advised that the inner wall of the north tower flats would be translucent but not transparent. Although the innermost rooms could be well lit there would be no view from them.

The frontage to most of the flats is not sufficient to accommodate a living room and one, let alone three, bedrooms.

The London Plan requires private amenity spaces (5/9m<sup>2</sup>) attached to each flat. This could be in the form of a balcony or winter garden. none are shown on this plan.

No more than 8 flats per floor should be accessed from one core.

***The BCC considers that if any residential units are included in the scheme they should fully conform to adopted standards. We anticipate that this would require a re-design of the three towers.***

***Fundamentally this is not a suitable site for residential units and we ask that no residential units should be included in the final scheme.***

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

London Plan standards show that off site play close at hand is acceptable, but Inspectors have determined that access to play across major roads like the A4 is not. There are no play facilities on site for 5/11 or 11/18 year old children.

In addition to balconies or winter gardens it is necessary to provide communal open space for a scheme with 350 flats. There is no private communal amenity space as the 4,000m<sup>2</sup> second floor park would be an amenity for the area.

We noted from your drawings that much of it beneath buildings and that much of the open areas are over-shadowed by your buildings or the BFC flats for much of the day.

A single play area for young children to play has been provided. We expect that many of the 234 2 and 3 bedroom flats will be family homes and that additional areas for under 5 play will be required.

***The provision of communal open space should conform with accepted standards.***

## **17. Privacy.**

When balconies or winter gardens are added to the towers it is likely that privacy could be further compromised, as the towers appear to be too close together. Additionally, as your section shows, the southern tower is leaning out, over powering the middle tower. While this contributes to the silhouette it is likely to lead to substandard conditions for those living in these single aspect flats.

***We consider that privacy is very important in high density schemes and that accepted standards should not be compromised.***

## **18. Sunlight and Daylight.**

You advised us that sunlight would only penetrate to the communal open space, and to many of the flats in the morning. We also noted that nearly half of the flats on the 10th floor plan faced north and might get no sunlight for much of the year. This does not conform to London Plan standards.

***It is essential that all these single aspect flats receive at least the minimum amounts of sunlight and day light.***

## **19. Air Quality.**

Drawing 0.4 indicates areas where air pollution is particularly bad. We understand that in parts of this site air pollution may reach 10 times the level recommended by the EU.

***We appreciate the way the design has attempted to reduce this problem, but feel that an objective professional assessment of air quality both within the buildings and in the open areas in and around the site is required.***

The 1170 residents, including their young children, will be continuously exposed to these conditions as they live here and move about to shops, parks, schools and nearby friends.

## **20. Noise.**

The northern tower is nearly touching the M4 as your section shows. Residential units are about 4 floor levels above the road, but it is likely that no-one living in the flats facing the road could open the windows.

We understand that all these windows will be permanently closed so that these flats will be hermetically sealed boxes.

***The single aspect flats facing north or facing the motorway are unacceptable.***

## **20. Turbulence.**

You advised us that air movement would be encouraged by the shape of your towers which reduce pollution. It may also cause turbulence.

A full evaluation of potential turbulence should be included in the application documents.

## **21. Parking Impact and Traffic Movement.**

You advised us that on site parking would be restricted. The PTaL is not high and we are concerned that this may discourage people from buying flats, visiting offices or coming to the car showroom for a test drive. Any problem of this kind could reduce the chance that these elements would make the scheme viable in reality. Your design is not flexible. If parking turns out to be crucial it will not be possible to solve it later.

Brentford residents experience delays every day and it takes little to create grid-lock. We fear the traffic impact of the adjacent stadium and cannot believe that the new projects in the area will not add to the problem.

***We believe that an essential part of the holistic plan for the Great West Road area will be traffic improvements. This scheme may fail if it proceeds before the traffic problems are resolved.***

## **22. Programme.**

You advised us (para 3.01, above) that the crucial element in this scheme is the bus garage. The original plan was to have the garage open so that the buses could leave Commerce Road in time to build a 2 FE school for Floreat.

Floreat are now in temporary accommodation in the Great West Quarter. If they stay for the full 3 years of their planning application they will need to move into their permanent school by September 2018.

It appears unlikely that the present design could be approved and the bus garage built by the end of 2016. Even if that could be achieved it would give the school only 18 months for site agreement, planning, design, construction and fitting out.

***The present design for this site is so complex that it is difficult to see how the basements, foundations and the bus garage element could be complete in the next 12 months.***

## **23. Summary and Conclusions.**

This is a complex design. It is anticipated that it will be surrounded by other dense development. Residents are concerned that East Brentford will be so over developed that life will become more and more difficult for us all.

This scheme is part of that scenario. It is far too complex, both in its mix of elements and in its design for one to be confident that it will not fail. If problems occur they cannot be fixed, because the design is rigid.

***We consider that a far simpler brief and a far simpler design is needed if it is to be built before the supplementary local plan for the Great West Road is adopted.***

The BCC would wish to be re-consulted if you decide to amend your scheme. We feel that your team is full of innovative ideas which, if harnessed to a realistic brief, could promote the future of Brentford.

Yours sincerely

Denis Browne  
Chairman, Planning Consultative Committee  
Brentford Community Council

cc Michael Thornton, Marilyn Smith and Shane Baker.