

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

Sarah Scannell
East Team Leader DC
London Borough of Hounslow

BCC 759
February 9 2016

Dear Sarah Scannell,

Chiswick Curve.

On October 12th Mr Ian George of "Your Shout" and the design team for this project gave a presentation to the Brentford Community Council. On October 22nd the sub committee appointed by the BCC wrote to him (BCC746) and copied the letter to Hounslow DC. The letter was not acknowledged and no reference is made to it in the Statement on Consultations included in the application papers.

We note that few changes have been made to the scheme since October.

On February 8th 2016 the BCC reviewed the scheme again and they have asked me to write to you with their adopted views:

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 servicing it without further disrupting traffic flows.

As the application states, this is an isolated site, and we do not believe that 1200 people can enter and leave it at street level without disrupting the traffic. Access for the cars parked on the site and service vehicles would present further disruption.

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

2. Urban Framework.

This drawings show the proposal for this site in the context of a development proposal which the Council have been considering. This context plan is now

shown in detail in "The Golden Mile Site Capacity Study, Final Report", which is a background paper for the Great West Corridor Plan. The Corridor plan is expected to take two years to prepare and, if agreed, could be adopted at the end of 2017.

The applicant has presented his scheme as an isolated tower, but the context plan shows the "enabling development for the Brentford Football Club stadium (approved subject to CPO) and the bus garage development on Capital Interchange Way (both 20 storeys) as well as further high rise buildings in the "Kew Gate Area".

Further development proposed includes other high rise buildings close to Chiswick roundabout as well as a 35/40 storey tower replacing Great West House at the sw corner of Boston Manor Road and the A4 and a further high development opposite Gillette.

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.

If the council approves this scheme and proceeds with their Corridor Plans there could be no confidence that this application, if approved, would always be the pinnacle of the Golden Mile developments.

4. Comprehensive Development.

When the Great West Corridor Plan has progressed further and been the subject of a rigorous analysis at a public local inquiry a more comprehensive scheme might be produced. It is understood that the B&Q site may then be available for development and there may be the basis for a redevelopment plan for the two sites and the intervening road.

The enlarged site would still be bounded by two dual carriageways carrying heavy traffic, but it may be clearer when transport improvements can be made to allow a higher PTaL and whether realistic measures are in sight to reduce the high levels of pollution.

Any improvements should be re- measured so that it was then clear what would be the appropriate mass and design for the enlarged site, how it might be united with Chiswick and Brentford an whether the planning brief should include any residential development together with the amenities they need.

5. 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 nor where these might be located

6. 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.

Developments should confirm to the density appropriate to the present PTaL.

7. 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 320 (30% affordable) mostly in 1 bedroom flats with few facilities on site or nearby.

8. High Building Policies.

The London Plan says that tall and large buildings should (a) be limited to sites in the CAZ, Opportunity Areas or Areas of Intensification or town centres that have good access to public transport. (b) Should only be considered where character would not be adversely affected, (c) relates well to the form, proportion, scale and character of the surrounding buildings, urban grain and public realm particularly at street level.

This building would be the tallest in West London. It would be totally incompatible with the scale and grain of the predominantly 2/3 storey terrace housing around it.

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 yet 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 which specifies maximum heights for the surrounding buildings.

9. Mass and Height and Profile.

The mass, height and profiles of landmark buildings should be judged on grey days from ALL angles. Despite the use of light reflective materials the building is likely to dominate the skyline from many parts of west London.

10. Impact on World Heritage Site at Kew.

The buffer zone for the WHS in Brentford was intended to protect vistas within the gardens from obtrusive high buildings.

If buildings on the A4 rise to 30+ storeys the cumulative impact will cause unacceptable harm.

11. Impact on Conservation Areas.

The application site is surrounded by designated Conservation Areas, mostly consisting of low rise residential buildings. The proposed building will 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.

12. Planning for The immediate Context.

The inspector at the Kew Bridge PLI ruled that the impact of a tall 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.

13. Facilities for Small Office Units

We welcome the provision of small office units with effective back-up and good communications. However the site does not have a high PTaL nor will the offices have access to many of the 81 on-site parking bays which have also to provide for the 320 flats.

We think this type of provision should be in a town centre site with a high ptal.

14. Provision of Residential Accommodation

The typical floor plan appears to show 1 3br,(10%) 2 2br (20%) and 7 1br (70%) flats. This mix will not meet the need for family housing. The Council has not welcomed residential development on the A4 sites.

It is noted that the previous applications for towers on this site have all been for offices.

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 offices.

15. 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 5-7m² private amenity space plus 25m² 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 sub-standard The proposal is in the most polluted area of the borough.

16. 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.

17. Sunlight and Daylight

The atrium faces SE so it will only enjoy sunshine early in the day. Most of the 320 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. Turbulance.

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 81 parking spaces, shared by about 800 residents in 320 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.

It is understood that the PTaL is medium (3 to 4). The scheme would be served by bus services and by trains at Kew Bridge station, giving access to Hounslow and Waterloo. These trains are already full at peak times. It would also be serviced by Gunnersbury where TfL do not own enough land to improve an over-used station. It is noted that other developments (like earlier Alpha Laval applications) on the A4 have proved to be unviable as access was too poor.

Access by public transport to this site is clearly inadequate.

20. Highway Movement.

The site is correctly described 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 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 radials leading to 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.

See para 4 above. This scheme should not be approved. When comprehensive multi-level access and servicing proposals are incorporated and when the Council have adopted a comprehensive master plan incorporating adjacent sites 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 this scheme should be refused as premature and as an unacceptable over-development.

When the A4 Corridor plan has been approved 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.

We would like to thank you for involving the BCC in a pre-application meeting to consider the merits of this scheme. We regret that none of the comments put to you at that time materially altered your application.

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, Ruth Cadbury MP. Local Amenity Societies. The applicant. d