

Shane Baker
by email

From: Denis Browne, Chairman

Dear Shane,

January 11 2017
BCC 779.doc

Planning Application: Morrison Site, Brentford High Street.

The BCC met this week and I can now send you the views they adopted. I would be grateful if you can incorporate them in your report and let us know when we can see a copy.

1.0. Previous Consultations.

- 1.01. The Brentford Community Council received presentations from both Essential Living and London Green to consider their preliminary ideas last summer and we sent you agreed minutes of those meetings.
- 1.02. We can now respond to the submitted scheme for the Morrison site.
- 1.03 We note that the application does not include a contextual plan for the two sites.
- 1.04. In our view the two sites must be considered together and no decision on either site should be taken in isolation. We have been advised by London Green that they intend to submit an application shortly
- 1.05. The Morrison site raises a large number of issues in its own right and our views on these are set out below.

2.0. Regenerating Brentford Town Centre

- 2.01. We welcome initiatives to progress the regeneration of Brentford District Centre, which is called for in the Local Plan (policy TC2).
- 2.02. However, we note that the Council has not updated their earlier plans to co-ordinate redevelopment. As a result, this proposal is put forward without a firm context.
- 2.03. It would be desirable for the Town Centre plan to be updated so that it can be part of the brief for other town centre sites, including the north side of the High Street and the site of the former Police building.
- 2.04. We note that the Design and Access Statement (D&AS) does show (p 76) the development plans for the South Side of the High Street (blocks F and

G) as they have received outline consent, which determines the permitted footprint and height of each block.

2.05. We ask that a plan showing the interrelationship between this scheme and the adjacent London Green site should be included in this application

3.0. Relationship to Dock Road.

3.01. We welcome the decision to open up the view across the site from Dock Road to the spire of St Paul's church.

4.0. Building Heights and Density

4.01. We note that the buildings proposed would have the equivalent of three floors of retail and parking with up to 8 floors of residential above.

4.02. This would produce 10 floor cliffs on the perimeter which do not accord with the character recorded in the Character studies prepared for the Local Plan.

4.03. The development is over the density recommended in the London SPG (200/700 hr/ha) where the PTaL is 4. The site area is 0.63ha.

4.04. The 2016 Housing SPG (para 1.3.70) states "in calculating density in vertically mixed schemes (ie; where housing is on top of non-residential uses) it may be appropriate for the size of the site to be reduced by an amount that is equivalent to the proportion of total floor space allocated to non-residential uses before calculating residential densities"

4.05. On this basis. the non-residential floor space (D&AS p80) is 4,270m². The residential GIA is 19,510m². Making a total of 23,780m².

4.06. The non-residential floor space is 18% of the total.

4.07. The "reduced" equivalent site area is 0.52 ha.

4.08. Giving a density of 1,000 habitable rooms/hectare, which exceeds the density recommended for urban developments with a PTaL of 4 (200/700 hr/ha)

4.09. The 2016 Housing SPG 1.3.9 states "Unless additional significant reasons to justify exceeding the top of the appropriate range can be demonstrated proposals should normally be resisted"

4.10..The over development of the site has led to many of the problems this proposal would create.

4.11. We request that the buildings be reduced by two floors so that the number of habitable rooms would be approximately 356, giving a density of about 685 hr/ha which would be within the density guidelines.

5.0. Materials and Design related to Local Character.

5.01. It is noted (D&AS p 71) that public consultation brought out concern about materials and scale and the character of the proposed building in its local context.

5.02. The applicant describes the reduction in height as a positive response to the public comments.

5.03. The further reduction proposed above would further improve the design and integrate it into the character and scale of the area..

5.04. Brick facing to the facades has been welcomed, particularly if light colours, sympathetic to London Stock Brick, are chosen.

5.05. It should be noted that brick and pre-cast blocks have been chosen for buildings B and C in the Ballymore scheme for the South Side of the High Street, which have detailed planning consent.

5.06. We ask that an agreed palette of brick and other facing materials is established for the redevelopment sites in the Brentford town centre.

6.0. Impact on St Paul's School and St Paul's Conservation Area.

6.01 The Back Lane Elevation is shown in the D&AS (page 112). No computer generated images of the development as seen from the St Pauls CA are shown.

6.02 It is clear that the design of this building does focus on the High Street and that the Back Lane is the back.

6.03. The houses on Lateward Road are little higher than the retail and parking service parts of block A. The skyline, 10 floors up, would cause irreparable harm to the scale and character of the St Paul's Conservation Area.

6.04. Additionally, the eastern part of block A would overlook and overshadow St Paul's Primary School and playground.

6.05. We ask that the proposed buildings should be reduced by 2 floors so that they would be closer to the height of the mature trees in St Paul's Recreation Ground. This would significantly reduce the harm to the Conservation Area.

7.0. The new Piazza and the Link with new Waterman's.

7.01. We welcome the introduction of the new piazza at the centre of the scheme. It is an attractive feature with skillfully designed level changes on the route from Dock Road to St Paul's Church. It forms an important focus, opening up new frontages within the scheme.

7.02. The importance of the piazza as a link with the proposed Waterman's Arts Centre was discussed with London Green and Essential Living and we are sorry to see that this crucial relationship has not yet been resolved.

7.03. During the development of these schemes the main entrance to the Arts Centre was moved to the southern end of that site. However, it was not located at a point where the piazza could be the setting for the centre's main entrance.

7.04. Instead the Art Centre will now be approached from the back yard of the Beehive public house, which is outside the Essential Living site. No designs for this area have been shared with residents.

7.05. We also requested Essential Living to alter their design so that the new supermarket could be entered from the piazza.

7.06. Bringing the supermarket, the smaller restaurants and shops and the Arts centre together could have produced a lively and varied focal point at the east end of the town centre.

7.07. We regret that this opportunity has been missed and we ask the Council to support our view that the design should be amended before it is approved.

8.0 Residential Development: Mix, Single Aspect Units & Privacy.

8.01 The application is for 225 units. Family housing (defined as 3 BR units in the London Plan Glossary) accounts for 19 units (8%) which does little to meet the local need for larger units.

8.02. On a typical floor there are 41 units. Of these 33 are single aspect flats.

8.03. 80%. The SPG proposes that schemes should "minimize the number of single aspect dwellings"

8.04. Of these single aspect dwellings 7 face north and 8 face east on each floor. 37%.

8.05. The SPG states that "north facing single aspect dwellings should be avoided where possible.

8.06. The D&AS (page 113) has a special section on privacy to cover the 4 units on all the 8 floors which are only 12 meters apart (32=14%).

8.07. It is noted that the SPG states that "the 18/21meter (separation) is still a useful guide, but that it should not be rigidly adhered to"

8.08. It may be acceptable to plan living rooms 12 meters apart when there is a second window, but the slight stagger shown to protect the bedrooms is not enough to ensure privacy over eight floors.

8.09. We ask that the residential designs are amended to increase the proportion of habitable rooms in larger units, to reduce the proportion of single aspect units facing north and east and to improve the measures taken to protect privacy.

9.0. Special Housing.

9.01. We welcome the Access Statement (D&AS para 6.8, pages 98/103)

9.02. However, we consider that this does not adequately cover the needs of the elderly.

9.03. The 2016 SPG (para 3.7.4) notes the increasing number of elderly people and the advantage of providing them with sheltered accommodation to meet their needs and to release under-occupied family homes. It notes that sites in town centres are particularly suitable for those who find walking difficult and who need shops and services close at hand.

9.04. No sheltered housing has yet been provided in any redevelopment site in Brentford town centre.

9.05. Essential Living resisted this proposal as they have no experience in this field.

9.06. However, this may be a case where the Council, as the Local Planning Authority, ought to ensure that some special housing is provided.

9.07. We ask the Council to secure sheltered accommodation in this scheme.

10.0 Managing Amenity.

10.01. We note that the D&AS has a special section on the Amenity Strategy (pp 92/95).

10.02. We welcome the introduction of internal community areas and roof gardens.

10.03. However, these are not a substitute for private balconies. Only 26% of the dwellings have private balconies and many do not meet the space requirements set out in the SPG.

10.04. SPG Standard 26 requires 5m² for each dwelling for one or two persons and one extra square meter for each additional occupant.

10.05. We note with concern that (on page 106 D&AS: windows and balconies) it appears that these elements are primarily located to "add a sense of proportion to the elevations and provide interest through colour and finish".

10.06. We ask that the design should be amended to provide all dwellings with direct access to private space on roof gardens or to private balconies, conforming with the minimum dimensions proposed in Standard 26.

11.0. Parking.

11.01. The present Morrison supermarket is approximately 3,000m². It has 127 parking spaces, which are only fully taken up at peak times.

11.02. The proposed retail area is 4270m². An increase of 42%.

11.03. The proposed retail car park is for 90 spaces.

11.04. Given that the new retail will provide more efficient trading space, it would appear that 90 spaces will not be enough to meet demand.

11.05. If all the 10% disabled spaces are required for disabled residents the commercial spaces will be reduced to 81.

11.06. We note that residential car parking standards are maxima and that public transport is reasonable (PTaL 4), but we are concerned that no

parking is proposed for residents who are not disabled.

11.07. We are further concerned that the proposals for the adjacent new Waterman's Arts Centre, together with the 100 flats above, also has no on-site parking.

11.08. We note that the present Watermans has a car park and that patrons can purchase annual parking permits. We do not believe that a larger Arts Centre could survive without relying on a regional audience which will include many who wish to come by car.

11.09. While we appreciate that this application has to be determined on its own merits it is never the less incumbent on the Council to ensure that all the elements in Brentford Town Centre are truly sustainable.

11.10. We ask the Council to review the briefs for the London Green and the Essential Living sites to ensure that both have adequate parking and that together they meet on-site their fully researched parking needs.

and

11.11. That any approval for either site is conditioned to ensure that residents have no access to parking in adjacent CPZs and that the area around the site is patrolled by traffic wardens when these facilities are open.

12.0 Programme to suit Brentford residents.

12.01. It is understood that the current lease held by Morrison's only extends to 2018 and that, if approved, this development would then start with the demolition of the existing building, excavation across the site and the construction and fitting out of the new retail. A period of about two years, during which Brentford would have no major convenience store.

12.01. The period could be longer if the 8 floors of flats above had to be built before it was safe to open the new shops to customers.

12.02. The present application does not include any provision for a temporary supermarket and car park.

12.03. We understand that the applicant may offer to run a shuttle bus to another convenience store during this period.

12.04. However, we note that the large Tesco at Osterley has already taken away much of the retail trade from Brentford.

12.05. To repeat this process can only undermine the credibility of Brentford as a District Centre.

12.06. As Local Plan Policy TC3 recognizes, Brentford needs additional convenience goods floor space now. It will not survive if the major convenience outlet is closed for several years.

12.07. We ask you to reject this application as premature unless it includes an acceptable alternative convenience store with parking in central Brentford which will remain open until this project is complete.

13. Omissions:

13.01. While the Design and Access Statement is an extensive document it omits several vital issues which may not have been addressed in other documents submitted with the application:

1. SSSI Impact. This issue is raised in the Local Plan description of the site but is not addressed in the D&AS.
2. Archaeology. The site may be on the line of the Roman Road. No reference is made to measures to record and conserve any remains in the D&AS. If remains are identified it may further extend the time when local residents could be without a convenience store (see para 12 above).
3. Sensitive Views. Computer aided images of the proposed development are included from some points of view. However the D&AS contains no views from:

Brentford High Street looking towards the Beehive PH.
Across the St Paul's Recreation Ground (CA) taken from Lateward Road.
From the south side of the Recreation Ground close to the County Court.

I will be writing to you separately about these important views with details to show where the images should be taken from.

It would also help members to appreciate the recommendation made in paras 4 and 6 above if images showing a structure reduced by 2 floors was included in your report.

14.0. Summary and Recommendations.

14.01. The BCC asks you to refuse this application so that an amended scheme can be brought forward which

14.02. Reduces the height and density to conform to Development Plan Standards and to respect the character and scale of residential Brentford.

14.03. Reduces the "harm" to the St Paul's Conservation Area and St Paul's School.

14.04. Improves the on-site Amenity provision to meet SPG standards

14.05. Reduces the number of single aspect units, particularly those facing north and east.

14.06. Includes adequate parking for commercial units and residents.

14.07. Includes measures to ensure that residents are not left without a major convenience store and car park in central Brentford.

Sincerely

Denis Browne,
Chairman, Planning Consultative Committee
Brentford Community Council.

Cc Applicant
Local Ward Members
Leader of the Council
Ruth Cadbury MP