

Shane Baker,
London borough of Hounslow

February 16 2017

By email

Ref: BCC 783

Dear Shane,

Planning Application: Capital Interchange Way.

The Brentford Community Council received a presentation from the design team for this project in November 2015 and has visited the public exhibitions which have been held since.

The BCC have now reviewed the application version of the scheme and they have asked me to write to you to request that you include these observations in your report to members.

1. Background

1.01. The Local Plan (Volume 2 page 266) identifies Site 21 Brentford-Brentford Bus Depot (in Commerce Road) as the site of the depot. The proposed use of that site is identified "as suitable for the expansion of existing primary school provision in Brentford" No site allocation is included in the 2015 Local Plan for "re-providing the bus depot in Brentford".

1.02. The application site on Capital Interchange Way is adjacent to the proposed Brentford Community Stadium and the 910 high rise flats which have received full planning consent. (See appendix A).

2. The Master Plan.

2.01. The BCC were advised by the design team in November 2015 that they had not been given a planning brief at the outset, as at that stage no work had been done to prepare a Master Plan.

2.02. The application includes a Design and Access Statement (D&AS) which at para 2.23.11 states "that as the development is in close proximity to (the BFC flats) the application site requires coordination..."

2.03. In December 2015 the Cabinet authorised the preparation of a Review of the parts of the Local Plan which had not been agreed with the Inspector after his Public Inquiry. The reviews were to cover the western edge of the borough and the Great West Road.

2.04. The Great West Road Review started with an issues paper consultation early in 2016. It is understood that the Review may not be completed before 2018/9.

2.05. In September 2016 Cabinet approved proposals for the adjacent Fountain Centre redevelopment including the preparation of a Master Plan.

2.06. In January 2017 the Leader of the council advised us that “the Fountain Centre is on the fringe of the master planning exercise that is currently being undertaken by Urban Initiatives (the council’s appointed external consultants), under the Great West Corridor Master Plan which, on completion, will inform and influence the Local Plan Review”

2.07. We were also advised that “they anticipate consultation with a wider public in June/July 2017” and that key stakeholders will be invited to participate in March/April 2017.

2.08. It is clear that the design team were working in a vacuum and that their proposals should have been put forward in the context of an agreed Master Plan.

3. “Enabling Development”

3.01. When the design team presented their scheme to the BCC in November 2015 it included a data storage facility, offices and car showrooms which were included to produce income to offset the cost (£ 26 million) of the bus depot.

3.02. It also included 350 flats to “enable” the bus depot to be provided.

3.03. The scheme was amended when it was appreciated that the car showroom was to be located on another site and the data storage facility was not required.

3.04. To balance the books the “enabling” housing element was increased from 350 units to 550.

4. Urban Design Context.

4.01. The D&SA para: 2.15 demonstrates that the site is surrounded by other tall buildings to show that it is following precedent.

4.02. The applicant’s design response has been to mark out the individuality of this scheme by proposing three eccentric buildings which would ensure that they would, for a time, be the centre of attention.

4.03. However, the site may not be the focal point of the emerging development in East Brentford, nor the position for a landmark building. Without an approved Urban Design concept for the area. It is still possible that other sites will be promoted in competition, as has already been attempted by the recently rejected scheme for the Chiswick Curve.

5. Design Form.

5.01. In the D&SA (para 1.5.4) The design team (aLL Design) state that “they are committed to “an architecture of delight and enjoyment”

5.02. They illustrate this objective, but omit to mention projects like their recent application for housing near Waterloo (see appendix B) which was rejected after intensive local opposition.

5.03. Our view is that buildings which rise to 20 storeys should not be designed to shock. They should make a contribution to their environment which will stand the test of time.

6. Context: Brentford Football Club Housing .

6.01. Appendix A shows the relationship between the application site, the existing Fountain Centre and the Brentford Community Stadium and its associated housing, which has full planning consent.

6.02. It appears that neither the Environmental Statement Volume 3: Built Heritage, Townscape and Visual Impact Assessment nor the Environmental Statement Appendices (Vol 4) take any account of the proximity of the site to blocks G,H and I of the BFC complex.

6.03. Without this information the planning committee will not be able to judge either the way these two schemes will be seen together nor the quality of the spaces between.

7. Impact on Conservation Areas, Character Areas and the Thames.

7.01. The impact on Character Areas is most apparent in the open views (including nos 5,6,9, 11 and 26, in the applicant’s Environmental Statement Vol 4), where the discordant nature of the design can be most clearly seen.

7.02. In addition, the eccentric nature of the design will also register as being alien to the local character and scale of the many conservation Areas which surround the site (listed in Vol 3 paras 5.5/5/118).

7.03. The design is also contrary to the policy of the Thames Landscape Strategy, which opposes “high rise flat roofed buildings”. Views 11 and 26 illustrate the impact of the proposal on Thames views.

8. Site Area and Density.

8.01. The site area is given as 0.6 hectares. The PTaL is not stated but appears to be 3 or 4.

8.02. 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”.

8.03. The non-residential floor space (bus garage 5,500m² + offices 4,000m² café 112m² = (approximately) 9,600m².

The residential floor space (D&AS para 5.8 = 48,692m²

The non-residential floor space is 16.5% of the total.

The “reduced” site area = 83.5% of 0.6ha = 0,5 ha.

The number of residential habitable rooms = 835.

Giving a density of 1,670 habitable rooms/hectare, nearly two and a half times the maximum recommended in the 2016 housing SPG.

That SPG states (para 1.3.9) “that unless additional significant reasons to justify exceeding the top of the appropriate range can be demonstrated the proposal should normally be resisted”.

8.04. The BCC is aware that housing has been included in this scheme to “enable” the £26 million bus depot to be funded with minimal cost to the public purse.

8.05. This was clearly demonstrated when the 350 flats included in the November 2015 version of the scheme was increased to 550 flats in the application version to compensate for the loss of office and data storage elements which had to be omitted.

8.06. But the consequence of this excessive density is a scheme which is an unacceptable “departure” from the development plans and a scheme which will create an unacceptable environment for the new residents.

9. Residential Mix.

9.01. The local housing need has been identified as family housing. On this very hostile site family housing would be particularly inappropriate.

9.02. In the November 2015 scheme the mix was;

Studios = 0. 1BR flats = 117, 2BR flats = 117 3BR flats = 117

In the application scheme the mix is:

Studios = 40 1BR flats = 232 2BR flats 220 3BR flats = 3

9.03. Never the less, if housing is to be included in the scheme it should be noted that many Brentford families in 2 Br 4 person flats move away when their children reach puberty. This problem is recognised in the London Plan glossary which defines family accommodation as 3BR and above. On that basis, the provision of family homes has been reduced from 117 (33%) in the November 2015 version to 34 (6%) in the application.

10. Affordable Housing

10.01. No commitment is made to provide affordable housing. The D&AS offers “the maximum reasonable amount of affordable housing subject to overall viability”

10.02. This scheme comes after other major schemes in Brentford which have failed to provide sufficient affordable housing.

11. Air Quality Pollution.

11.01. The Mayor of London has published figures to demonstrate that central London and Heathrow have unacceptable levels of pollution. He is now consulting on measures to reduce pollution and to penalise diesel and older vehicles.

11.02. There is significant pressure to extend any penalties to the M25.

11.03. It is understood that “Hounslow Council will take a view, once the Mayor’s response to the consultation on extending the ultra-low emissionzone

is known, as to whether it can pursue the establishment of a local Clean Air Zone”.

11.04. It should follow that a very cautious view should be taken about permitting any residential accommodation close to the A4/M4 corridor.

11.05. The D&AS (para 2.23.5) recognises that “air quality on the application site “is perceived to be affected by the adjacent motorway and dual carriageways with their often congested roads, polluting the atmosphere”.

11.06. Measures to substitute “winter gardens” for open balconies are not acceptable palliatives. The residents may be protected within their dwellings by ventilation systems, but they also need to go out to work, to school, to shop and for enjoyment.

11.07. An additional source of pollution will be the buses entering and leaving the depot. For the foreseeable future these will be diesel vehicles.

11.08. After a recent meeting on “Air Pollution in Brentford” addressed by our MP Ruth Cadbury the leader has undertaken to meet with TfL to discuss what measures can be taken to reduce pollution on the A4..

11.09. While any improvement will be welcome it must be unlikely that diesel vehicles could be banned on such an important corridor into London.

11.10. More effective measures would include plans that do not provide for any new residential accommodation close to the A4/M4 corridor.

12. Noise Pollution.

12.01. The D&AS notes (para 2.23.17) that “the roads, railway and low flying aircraft contribute to (high) sound levels on the application site”

12.02. Very high noise levels (up to 70db) are recorded. The suggestion that the northern block will be a sufficient screen to allow for quiet enjoyment on the raised garden or in the other two blocks is open to doubt. It is more likely that traffic noise by day and at night, when vehicle speeds increase, will be a continuing nuisance.

12.03. Additional noise pollution must be expected from the buses entering and leaving the depot, often at hours when most residents would wish to be sleeping.

12.04. The D&AS (para 4.12.2) quotes BSS 8233 to justify open balconies exposed to noise levels over 55db where alternative amenity areas are

provided. This might pass the letter of the law, but it further diminishes the quality of life for residents.

13. Wind and Microclimate.

13.01. The garden over the depot, the balconies and the roof gardens are all exposed to high winds. The design does include measures to baffle the full force, but it will remain a problem on many days of the year.

13.02. The D&AS states (para 2.23.6) that the fabric will need "frequent maintenance due to dust and dirt emanating from vehicles"

14. Single Aspect Housing, Access and Orientation.

14.01. The 2016 Housing SPG states that schemes should minimise the number of single aspect dwellings and that north facing single aspect dwellings should be avoided where possible.

14.02. The design of this scheme depends entirely on single aspect units.

Approximately 50% (275) of the units face north as their only aspect. another 20% appear to face east so they only receive sun in the morning.

14.03. The flats in the north block are reached by open galleries, a form of access which was discarded in the 1930s as being unsafe.

15. Amenity Provision and Public Open Space.

15.01. We are not clear what amenity provision is being made for residents.

15.02. The London Plan calls for 5m² for 1 and 2 person flats with an additional 1m² for each additional person in every flat plus community amenities for the use of residents.

15.03. Due to the high noise levels, dust and air pollution, some of the open balconies may not be fully used and the winter gardens are more additions to the net area of flats than open areas for outside living.

15.04. The D&AS (para 5.17) states that 49% of the site area has been dedicated as a public open space (above the depot roof) as a planning benefit. It is not clear from the plans what the actual free area would be when the floor areas of the three towers, the office pods and the café have been deducted.

15.05. Nor is it clear how much of the free area would be water space, planting or paths and how much could be a useful amenity space for play and for passive enjoyment.

15.06. Certainly, the garden design would provide an attractive parterre when seen from the flats above.

15.07. Actual enjoyment might be further reduced in the large areas shaded by the high buildings on this site and on the adjacent BFC site, by exposure to wind, dust and grit from the adjacent road traffic and from excessive noise. (See paras 12/14 above). (See Appendix A).

15.08. If this area is a POS it will not be for the exclusive use of the 1,600 residents. Their private communal amenity space would appear to be confined to the small roof gardens on the top of the three towers.

15.09. Inadequate amenity space is important on a site as hostile and as isolated from residential streets. The fact that the local park (Gunnersbury) can only be reached across a 40mph six lane dual carriageway does not help nor does the distance to Waterman's Park.

16. Transport.

16.01. The report by Steer Davies, Gleave "The Golden Mile: Strategic Case for Transport Investment, January 2015" states (conclusions 6.2) "that the current network has the effective capacity to accommodate around 40% of (the) demand..... The remaining 60% is to a large extent dependent upon a new transport infrastructure and supporting measures".

16.02. Para 6.9 states that "Major transport investments (ie the shuttle to Crossrail) are therefore essential...."

16.03. This assessment must give rise to a concern that those who come to the area before the essential traffic works are operational and those who already live and work in Brentford may face gridlock until then.

17. Advertisements.

17.01. The application includes major advertising screens similar to those on the Chiswick Curve building which was recently refused planning permission.

17.02. The Times (February 15 2017 page 3) carries an article which states "A British startup has created a new system that uses Lasers to project images up

to 200 meters tall from the sides of tall buildings. Passers-by will see each image for only between one tenth and one quarter of a second, as their eye catches the light from certain angles. Advertising agencies and big businesses have already signalled their interest, but skyline campaigners have branded the technology "greedy" and said that it would clutter the skies with tacky brands.

17.03. The BCC supports the policy of the Council to reduce advertising clutter on major roads like the A4 and welcomed the refusal to allow laser advertising on the Chiswick Curve.

17.04. We ask the Council to take the same line on this application and to be aware that new technology will make it more than ever important to refuse the advertisement element on this application.

18. Conclusion and Recommendations.

18.01. This application has been designed to an unsuitable density to ensure that a bus depot can be provided on this site without an unacceptable cost to TfL or to Hounslow residents.

18.02. The result is a project which fails to provide acceptable living conditions for 1600 new residents and which adds three additional eccentric towers to our already over-developed skyline.

18.03. The scheme also fails to meet the standards set by the London Housing SPG and the Local Plan for:

- | | |
|---------|--|
| Para 7. | The protection of Conservation and Character Areas |
| 8 | Density. |
| 9 | Residential Mix |
| 10 | Affordable Housing |
| 11 | Air Quality |
| 12 | Noise |
| 13 | Microclimate |
| 14 | Aspect and Orientation |
| 15 | Amenity |
| 16 | Transport. |

We request that the application be refused.

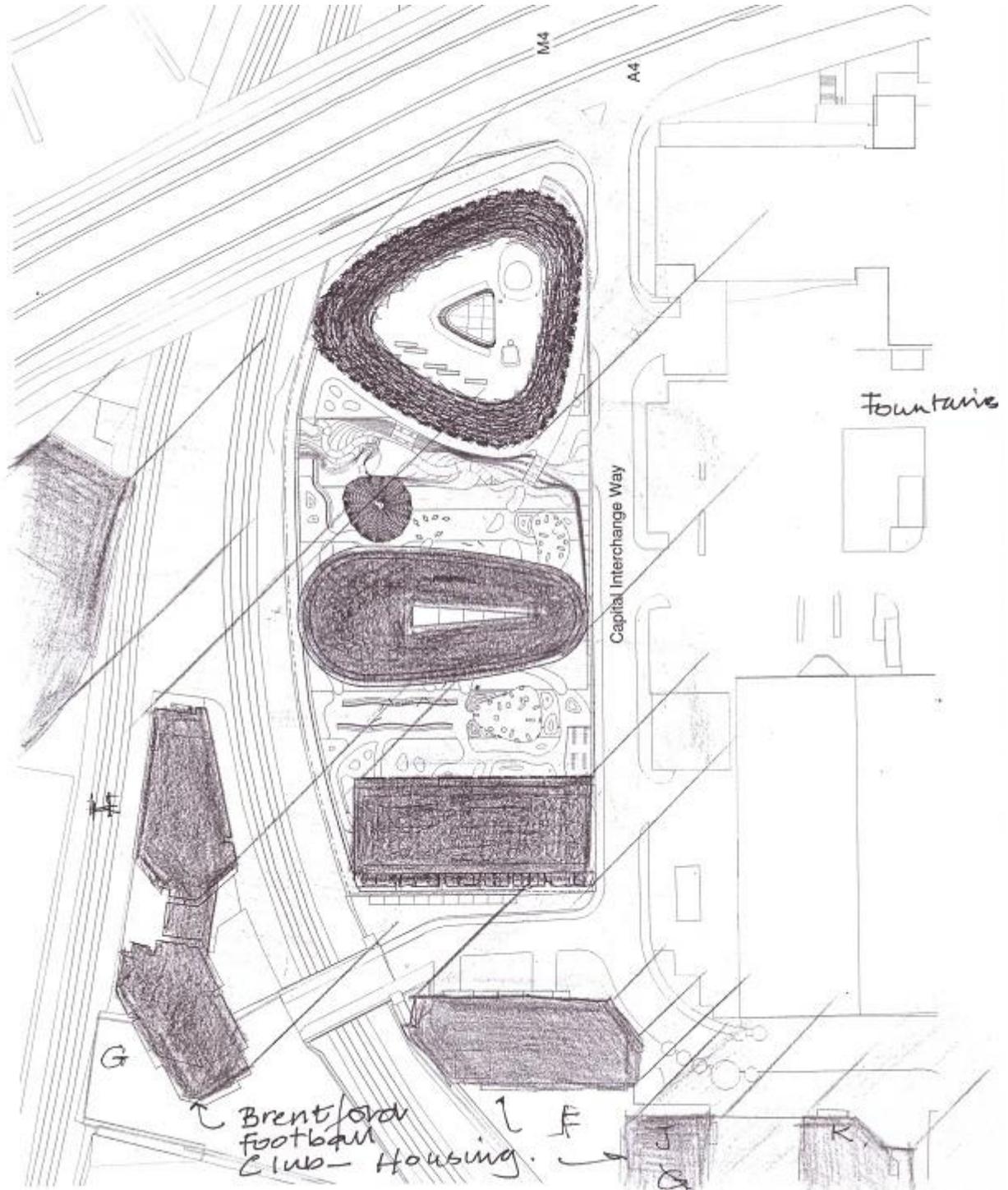
Yours sincerely

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council

Copies to:

The applicant,
Ward Councillors
Members of the Planning Committee.

Appendix A.: Site Plan showing application site high rise development and the flats on the adjacent Brentford Football Club site.



Appendix A: Model showing application site and adjacent housing on Brentford Football Club site.



Showing the relationship of the application scheme (outlined) to the approved housing blocks for the Brentford Football Club scheme.

Additional development for the Fountains Centre renewal may follow.

Appendix B:

The Beacon tower set to be scrapped after outcry over the 'alien phallus'

- **SOPHIA SLEIGH**
- Thursday 6 October 2016
- 10 comments



Click to follow
The Evening Standard



The Beacon skyscraper has been described as a “horrific alien phallus”

Plans for a 15-storey tower behind Damien Hirst's new art gallery look set to be scrapped after locals described it as a "horrific alien phallus".

Architect Will Alsop described the £6.6 million block, called The Beacon, as a "gateway to the emerging Vauxhall gallery district in south London".

The proposed tower, 100 yards from Hirst's Newport Street Gallery, would house 11 flats with a two-storey penthouse and roof terrace.

But neighbours have submitted dozens of objections to Lambeth council. They say the tower will be twice as high as surrounding properties, wrecking the area's character and blocking views of Big Ben. They also criticised its failure to include any affordable units.

More than 100 letters have been sent to planners with residents calling the scheme a "hideous eyesore" and a "horrendous monstrosity".

One resident said: "It looks alien. Like some horrific alien phallus from the nightmare visions of [Swiss artist] H R Giger."

Another added: "It looks like a Fifties science fiction film where a UFO crashes into a normal street. Why not at least try and design it in keeping with its surroundings?" Margaret Hanbury, a literary agent who works in Lambeth Walk and lives nearby, said: "It's a modernist fantasy of the worst kind."

Another resident compared the proposals unfavourably with Hirst's gallery, designed by Caruso St John, saying: "What does Damian Hirst have to say about all this? His new gallery on the same street was tastefully done and enhanced the neighbourhood."

The site, previously a public lavatory, was bulldozed to make way for a five-storey block of flats six years ago.

Locals said demolishing the block after such a short time was: “unethical and shameful”.

One wrote: “The proposed development is an entirely luxury development, which includes no affordable housing at all. This is absolutely scandalous considering the acute housing shortage.”

Not all residents have opposed the scheme, submitted by Alsop’s Hackney-based practice aLL Design. Some called it a “brave vision” and “refreshing”.

Alsop said all objections had been considered, including the height. He added: “The size of a development affects the number of affordable housing units provided.

“As The Beacon is a small development of 11 homes a cash payment, presumably for public benefit, was agreed with the council planners instead. This is standard practice for a development of this size.”

Lambeth planning officers have recommended that councillors refuse permission at a meeting on Tuesday next week.