

Shane Baker, Development Control
By email.

November 2017
Ref; BCC825

DRAFT

Dear Shane,

**Planning Applications: Watermans site, Albany Riverside
Former Police Building site Half Acre**

We wrote to you on July 15th 2017 (ref: BCC807) with our response to the pre-app consultation and exhibition for these two sites.

The BCC has further considered our views on these two applications and I have been asked to write to you again.

1. The BCC objects to the concept of moving the Waterman's Arts Centre away from its unique river-side position because:

On its present site it offers a very special experience, combining a lively and varied centre for the Arts which is accessible for Brentford residents and for it's clientele throughout west London with an exceptional position.

As part of the site is un-used there is scope to progressively improve and enlarge the Arts Centre at it's present location.

These developments could include some innovative high value housing above parts of the enlarged Arts Centre which did not compromise the setting of the Grade 1 listed Kew Palace across the river.

Additional parking for cycles and cars for residents and clients could be provided at low level on site.

2. The BCC objects to the proposal that a detailed planning consent should be granted for development on the Half Acre site when no details of the proposed Arts Centre are provided. Because:

The size and cost of the proposed Arts Centre is the driver for both applications. In making a balanced judgement on the merits of the two housing applications the size, cost and community benefit of the Half Acre Arts centre needs to be clearly set out in the application.

It is stated that the Half Acre Arts Centre would be the same size as the present one and that the facilities would be better arranged. There are no definitive plans to support this statement.

The recent proposal to raise an additional £6 million to increase the size and improve the scope of the Arts Centre would imply that even if planning consent were granted now no design and construction could start on the Half Acre site until the Trust had received this sum or had become convinced that it could not be raised. This in turn would lead to a delay in starting both the Half Acre development and that at Albany Riverside. This would add to the large number of housing projects in Brentford for which detail consent has been granted and no build out has followed.

3. Development at Half Acre.

The BCC would support an all residential development on this site which accorded with our development plan and caused no “harm” to the St Pauls conservation Area. Because:

The quality of the environment would be improved in Brentford Town Centre and St Pauls CA if a well designed building at a lower height replaced the present police building.

Much needed affordable housing could be provided.

An early start could be made on a building whose programme would not depend on complex consents or uncertain funding.

4. Development at Albany Riverside.

The BCC would support proposals to extend and improve the Arts Centre on its present site. Because

The Arts Centre occupies a unique site which is much valued both by Brentford residents and the wider clientele.

The site has the capacity to enlarge the Arts Centre facilities, to improve parking for cycles and cars and to service an enlarged auditorium.

The site has the additional capacity to include innovative high cost housing up to the level of the mature trees in the area which would not

“harm” the setting of the Grade I listed Kew Palace across the river.

The BCC fully endorses the views expressed by Kew and by Historic England (attached) opposing the current application.

Planning Application for Mixed Use Development at Half Acre.

5. CONTEXT AND URBAN DESIGN.

(References are to the Design and Access Statement).

5.01. Para 2.1 states that “the site is in the heart of Brentford Town Centre” This is not correct. The site is on the very edge of Brentford District Centre.

5.02. However, the site is on Half Acre which should be upgraded (see BCC response to the Great West Corridor Preferred Option consultation).

5.03 Half Acre is the principal link between the Town Centre and Brentford Station and the central section of the proposed Great West Corridor. As such the road needs to be upgraded to provide wider pavements, possible cycle superhighway connections to the A4, improved bus links and extensive tree planting.

5.04. The Plan, at para 4.1.1. shows virtually no set back from the back edge of the narrow pavement, which is shown with improbable trees planted in the pavement.

5.05. The photograph on page 74 shows the importance and scale of the existing trees and the amount of room they would require.

5.06. Local Plan Policy TC2 seeks to ensure “the vitality of town centres” and makes specific reference to Brentford. At the moment there is more retail and far more office provided on the Great West Road than there is in Brentford. It is essential, if policy TC2 is to be achieved, that Half Acre becomes the vital link. This will require set backs along Half Acre wherever they can be secured.

5.07. The BCC considers that the Half Acre frontage of this development should set back significantly to contribute to the phased improvement to Half Acre/Boston Manor Road from the High Street to the A4.

5.08. The site is within the St Pauls CA (para 2.5.4) and development would impact the Butts CA.

5.09. This proposal and that of the approved Morrison re-development are the only "tall" buildings (ie significantly higher than adjacent structures) which could harm the two CAs.

5.10. Although para 2.6.1. lists the two CAs as "constraints" it is not clear how respect for the lower scale domestic character of the two CAs has influenced the proposed design. The proposal should "enhance" the CAs.

5.11. The BCC considers that the cliff-like wall to Back Lane does not enhance the St Paul's CA.

5.12. When discussions on the development of this site and the Morrison site were initiated great importance was placed on the proposal to open up the Morrison site so that the church spire could be seen from the High Street. This has been achieved and a new urban space has been created with steps leading up to the northern boundary of that site.

5.13. The agreed intention was that these steps/ramps would give direct access to the Art Centre if it was built at Half Acre.

5.14. We note that NO advantage has been made of this proposal. There is no connection between the new space and the entrance to the Arts Centre, which is to be entered off the narrow Half Acre pavement.

5.15. We note that this integration was raised at Design Meeting 4 (para 3.4.6). It has not been resolved.

5.16 We regret that this opportunity to integrate adjacent designs has been missed.

6. ARTS CENTRE.

6.01. Para 4.1.1 refers to the access from Half Acre see our para 5.7 above. We note that vehicles unloading in the Back Lane lay by are not next to the scene dock. This is illustrated on page 74. It may be necessary to control this space with lockable bollards.

6.02. We note that the design proposals for the Arts Centre are provisional. The space created would appear to be efficient, but lacking in inspiration. We regret that the gallery is separated from the bar and foyer. A closer relationship might have helped new visitors to the centre to be more aware of the range of Arts being promoted.

6.03. We also note that only one stair is shown to basement level. If the theatre seats were retractable (as shown of the sketch section on page 38 para 3.4.3.) the space could be used with a flat floor if two escape stairs were provided.

6.04. We are concerned that no on-site parking is proposed. We know that the existing clientele include many who are too elderly or too infirm to use public transport in inclement weather. We have been given no figures to show whether the Art Centre could survive in Half Acre if it relied entirely on walk in customers and those who are willing to come out repeatedly by public transport.

6.05. Members should be satisfied that an Arts Centre in Half Acre without cycle or car parking would be sustainable before granting consent.

7. HOUSING PROPOSALS.

7.02. The podium garden (para 5.2.2) raises a number of issues. It can serve as an effective access to all the lift cores and as a safe playground for small children. However, it will be overshadowed in the afternoons for much of the year and it could become a gloomy space with echoing noises disturbing residents.

7.03. The blocks are 18m apart, but the projecting balconies reduce the effective distance to about 16m. They allow residents in the higher balconies to look down into the flats opposite.

7.04. The plan on page 49 shows that the flats in core C look directly into the playground of St Paul's Primary School. We know that this type of proximity has caused objections in the past (Eg: St Marks RC school).

7.05. We are pleased to see the floor plans for the flats conform to guide lines. However, the amenity space provision does not. No roof plans are shown. It may be possible to provide some amenity space there.

7.06. We note that cycle provision is to be provided partly by cycle racks on street. As the pavements are very narrow and the buildings are not set back as proposed in our para 5,07 above, we consider that this provision is unacceptable for a public building with residential above.

7.07. We also note that no on-site car parking is proposed, even for disabled people. Brentford is a District Centre with poor/medium PTaL. It is not acceptable to provide 105 flats in a dense mixed use scheme without any parking until additional public transport is provided.

7.08. We ask members to defer a decision on this application so these deficiencies can be addressed.

Planning Application for Albany Riverside.

8. HOUSING PROPOSALS.

8.02. We note that the site allocation in the Local Plan (page 21) is for “residential and re-provision of the Arts Centre either on site or within Brentford Town Centre”

8.03. We understand that a sustainable scheme, which included the re-provision of the Arts Centre on site would require unacceptably high rise development.

8.04. The current application which proposes up to eight floors of residential development is rejected by Kew and by Historic England.

8.05. The BCC supports these objections and asks members to reject this application because of the significant harm it would cause to the Grade 1 listed building (Kew Palace) and the Royal Botanic Gardens, designated as a World Heritage site.

8.06. As set out in our para 1 above, we ask members to seek an alternative plan to upgrade the Waterman’s Arts Centre and a limited amount of innovative housing to conform with the Local Plan site allocation and the constraints sought by Historic England.

8.07. The BCC has objected in the past to proposals to increase the height of the adjacent developments on Goat Wharf and on Albany House (Lighterage Reach).

8.08. In asking members NOT to agree to the additional floors to each of these projects, we drew attention to the very long river frontage of the Watermans site as it was then thought it could be up for redevelopment later.

8.09. Not only were both these developments built out with the additional floors but they appear to have become a precedent for this application where the skyline has been raised by a FURTHER two floors.

8.10. The effect is to create a high wall of development, excluding the Thames and open views to Kew for all other Brentford residents.

8.11. In addition, the five separate blocks (see page 50) are planned so close together that only occasional diagonal open views from the High Street would be possible.

8.12. Brentford East is an area of Open Space deficiency and rising densities. Every measure which reduces the enjoyment of open spaces and the river should be resisted.

We ask you reject both applications so that plans can be prepared for affordable residential development on the Half Acre site and a phased upgrade for the Watermans Arts Centre can be proposed on Albany Riverside.

Yours sincerely

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council