

# **Brentford Community Council**

c/o 48 Braemar Court, Brook Road South, Brentford, Middlesex, TW8 0NA  
www.brentfordcc.org.uk

## **Daft Comments on Revised Plans for the former Alfa Laval Site.**

Ealing Road, Brentford

ref BCC 402

BCC Comments on application of November 2007

### **1 Context**

Wallis House now has permission for a dense mixed-use scheme with buildings with gaps rather than a wall, generally lower than this but one tower much taller.

The Borough's Employment Development Plan does not reserve the site for employment use, although it is close to a Locally Significant Employment Site reserved for industrial use. It is not described as a Key Office Location because of its relatively poor transport links.

Locally the emergent Brentford Area Action Plan has a preferred use as a mixed scheme including commercial employment generating uses, and residential with both private and affordable housing in a range of sizes.

The previous application on which we commented a year ago was rejected by LBH, and generally received adverse comments during consultation. The scheme of March 07 introduced a street of affordable houses on the south side, and broke up the 'wall' against the motorway to look like three buildings. These were taller than previously. The current scheme is less tall in most locations.

### **2 Economic**

The principle of a mixed use with some residential element is accepted. However this is an important employment site in the BAAP, so it should retain a preponderance of employment generating floor space, by which is meant more than 50% of the built floor area. In addition any development leading to loss of total potential employment should be refused.

We accept that the uses of an office block at the west end, serviced apartments in the middle and a hotel at the east end are appropriate

The office block on the northwest corner will catch the eye of motorists approaching London, which makes the unremarkable design all the sadder.

### **3 Social**

The affordable housing in this scheme is in line with recent permissions for change of use granted in the region. The provision of the terrace of three and four bedroom affordable

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houses is particularly welcome. The remaining affordable sections of housing are well integrated into with the private housing.

The serviced bedrooms are counted as a “hotel” use in planning categories, but they are in effect short let flats, and the demand on some local services will be similar to that of housing. Other services, such as schools, will not be affected. The population of these units will by definition be transitory, which will not assist in the formation of a community in the new development.

There is no provision for any social facilities within the complex.

#### **4 Density**

Although the sides and south of the scheme are lower and more open than the previous application, the north wall is actually taller and the plot ratio remains over four, which makes it significantly denser than anything which has ever received planning permission in Brentford. Located out of the town centre and with a PTAL of between 2 and 3 this cannot be justified.

#### **5 Townscape and Built Form**

In many ways this scheme is architecturally more successful than it's predecessors.

It helps that the building footprint on the north side is now set back at least little from the public footpath, although this could be greater, in line with the open space to the north of the Wallis House development to the East, or the back gardens of the houses to the West.

We accept that for reasons of sound and air pollution the function of a wall on the North side is appropriate. We approve of the way the mass of this north wall has been articulated to read as three separate buildings, with different architectural treatments, frontage lines and heights. Unfortunately the height of such a wall necessary to perform its function as a barrier would be only about six or seven stories. The average height of the proposal at about nine stories, is uncomfortably out of scale with other neighbouring buildings.

The existing tower is significantly taller, as are a number of other buildings along the A4 corridor. While it may be acceptable to have the top of a “tower” at such a height, it is essential that it reads as such. This means that its width must be much less than its height and that its architectural treatment is as a vertical building, not as a horizontal or rectangular one. We strongly recommend that the perceived general height of the north ‘wall’ be reduced to only six or seven stories, even if one slender tower element is taller than this.

The form of the remainder of the main body of the scheme is unfortunate in its unbroken nature. Other buildings in the area, although as large as the wings of this scheme, are

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separated from each other, allowing gaps between them to relieve the internal spaces of the sites. The three courtyards of this scheme would in contrast be very oppressive places.

The shape and massing of the side wings and the creation of the new public street on the south side are welcome. The location of the side wings is not.

The scheme offers little to the public domain on the north and side frontages. The building lines of the east and west elevations still align with that of the adjacent terraced housing. The application makes much of preserving the line of these streets. That would indeed be appropriate if the building was of terraced two-storied housing. However such large building masses as these should be set back from the street, as they are elsewhere in the vicinity. The proposed alignment of monolithic six to eight storied buildings hard on the back of the public pavement is completely inappropriate for anywhere this side of Hammersmith.

The form of a terrace on the south boundary is welcome, although the visual treatment of the houses is pedestrian.

## **6 Amenity**

The internal courtyards are improved, and it is welcome that the eastern one is now over real ground rather than a car park roof. Unfortunately little advantage seems to have been taken of this to provide an extensive green space with real trees planted in it.

The roof planting is welcome, and offers amenity to those flats that can access it.

Unfortunately the amenity provision for most of the flats is still well below the standard required by the borough.

The small but useful gardens for the houses are welcome.

## **7 Transport and Parking**

The site has currently a PTAL value of 2 and 3, which is low to medium public transport accessibility level. Proposed improvements to the 235 and H91 bus routes (to be implemented with the Wallis House scheme) would improve this to a PTAL of 3 in the entire site. This still does not support the residential density of this application in the national or regional guidance.

The new street, which will allow pedestrian / cycle thoroughfare is welcome, and it is noted that there will be traffic management to prevent through access to prevent any possible 'rat run'. This does not quite line up with the public access through the adjacent Wallis House scheme but will serve the same purpose of creating an east – west public route for cycles and pedestrians that avoids the A4.

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However the height and unbroken aspect of the north face of the building, combined with the sound reflection of it's face and the over shadow of the elevated motorway would make the A4 road edge unusable. It is a mistake to suggest that as these areas are already unpleasant it is acceptable to make them worse. In fact, the adjacent stretches of the A4 footpath face the backs of domestic gardens to the west, and the new Wallis House frontage to the west, both of which are much more pleasant than the frontage offered by this scheme.

The separation of utility vehicles from residential vehicles is well planned, with apparent thought given to means of service access and domestic waste removal and recycling waste, to keep it separate from the residents.

It accepted that the increased car journeys would not have a noticeable affect on local roads. The increase in bus passenger traffic could be met by increasing bus frequency, which could be secured by Section 106 contribution.

## **8 Air Quality**

The site suffers low air quality because of the adjacent M4. Annual average and daily average NO<sub>2</sub> and PM<sub>10</sub> concentrations will exceed future objectives.

It is helpful that the built form of the scheme will to some extent protect the residential windows facing the courtyard. The commercial parts of the building will have fixed windows with full air conditioning, which is regrettable when we are trying to reduce energy use of buildings.

## **9 Noise**

The site suffers high noise pollution because of the adjacent M4. Predicted noise levels are Category C & D ("permission should be refused") [PPG24 Annex 1].

We accept that the built form of the scheme will to some extent protect the residential windows facing the courtyard. The commercial parts of the building will need fixed noise-reducing windows requiring full air conditioning.

The building would create a noise shield to the houses in Layton Road, although it is higher than is necessary to achieve this.

We still suggest acoustic fencing be erected along the elevated section of the M4 to provide some screening, and that the mitigation measures should be designed to achieve "good" internal noise levels to BS8233.

There are concerns that the north wall will reflect noise from the motorway, increasing noise pollution to dwellings to the north of the A4.

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### **10 Daylight**

It is accepted that the proposal does not have a major impact on daylight of existing adjacent houses. However the daylight of the zone between the A4 road and the proposed building will be greatly reduced rendering this area very forbidding.

The daylight available to lower flats within the courtyards will be suspect. The distances across the courtyards are only 22 – 24m, and even the “low” south side is still three stories high in an unbroken wall.

### **11 Conclusion**

- The proposal, although acceptable in type and mix, is an over-development of the site with an overbearing appearance.
- The amenity space and daylight of many flats is likely to be unacceptable.
- The north elevation, although now broken into three buildings, is still too tall.
- Although the monolithic nature of the north part of building can be accepted as shielding residential areas from the A4, there is no need for the height to be greater than six or seven stories to achieve this.

### **12. Recommendation:**

***That the Council to seek further amendments to the proposal to reduce the height and density. Failing a redesign the present scheme should be refused.***

January 2007