

**TOWN AND COUNTRY PLANNING ACT 1990 SECTION 78  
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) 1990  
SECTION 20.**

**TOWN AND COUNTRY (PLANNING APPEALS INQUIRY PROCEDURE)  
(ENGLAND) RULES 2000.**

**PROOF OF EVIDENCE  
OF  
THE BRENTFORD COMMUNITY COUNCIL**

|                                       |   |
|---------------------------------------|---|
| Appellant:                            | Barratt, West London  |
| Proposed<br>Development               | Demolition of Existing Buildings and<br>Erection of two six storey buildings<br>Comprising 69 flats, 187 sq m of<br>Commercial Floor Space and 55<br>basement level parking spaces. |
| Site:                                 | Albany House, 41 High Street, Brentford.  |
| Planning<br>Inspectorate<br>Reference | APP/F5540/07/2061824/NWF  |
| LPA Reference:                        | 00607/41/p26  |
| BCC Reference:                        | ALB/003/dmb   |

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### **1.0. SECTION 1: INTRODUCTION.**

#### **1.01. CV.**

I am Denis Browne. I represent the Brentford Community Council. I have been Vice Chairman and then Chairman of the Community Council's Planning Consultative Committee, since its inception in 1989. I am a member of The Royal Institute of British Architects and a retired member of the Royal Town Planning Institute.

I was formerly, successively, Senior Depute City Architect in Edinburgh, Director of Development in the London Borough of Hammersmith and Fulham, Director of Planning and Architecture to the Federal Capital Development Authority of the Government of Nigeria and Borough Planning Officer to the London Borough of Islington.

I have lived in Brentford for 19 years.

## **1.02. Witnesses:**

The BCC will call witnesses:

Mr Peter Eversden, Chairman of the London Forum of Amenity and Civic Societies, to which the BCC is affiliated.

His evidence will be given as **BCC 002**.

Mr Nigel Moore, Chairman of the Brentford Waterside Forum, affiliated to the Brentford Community Council.

His Evidence will be given as **BCC 003**.

Mr Stephen Browne, Secretary of the Holland Gardens Residents Association, affiliated to the BCC and himself an officer of the BCC.

His evidence will be given as **BCC 004**.

## **1.03. Written Evidence: Appendix B**

Written Evidence sent to the BCC is included in appendix **B** to this paper (BCC 001) or added to the appendix at the opening of the inquiry.

## **1.04. The Brentford Community Council (BCC).**

The Brentford Community Council (BCC) is an independent association of local groups and individuals living and working in the Brentford area of Hounslow.

The Community Council was originally set up in 1989, as one of a number of Community Councils, promoted by Hounslow Council. It has since become independent and non-political, and relies on local subscriptions and donations.

The Community Council is a focus for local issues affecting Brentford, including health, crime, safety and transport as well as development.

### **1.05. The Planning Consultative Committee.**

Since its inception the Community Council has had a Planning Consultative Committee, which meets regularly to consider plans and proposals for development within Brentford.

The views of this committee are sent to the Borough's Planning Department and are regularly quoted in reports to members.

### **1.06. The Thames Landscape Strategy. (TLS)**

The Brentford Community Council has been an active member of the Thames Landscape Strategy (Hampton to Kew) (TLS) through its Community Advisory Group. (CAG)

Last year I handed over the post of chairman of the CAG, a post I had held since the TLS was set up in 1995.

As chairman, I was also a member of the Members Review Group (MRG,) who determine the policy and programmes for the TLS.

## **2.0. BACKGROUND.**

### **2.01. Site Development.**

***The BCC believes that this site should be developed. However, we oppose this application and request that it be refused.***

### **2.02. BCC Views.**

The BCC considered the drawings submitted for Planning approval by Assael, in 2007 and sent their views to the Director of Planning in a letter (BCC 388, attached- see Appendix B).

The first application design was amended in August, but our views about the scheme as a whole remained the same, The views put to this inquiry relate to the application as amended in August 07.

### 2.03. 2<sup>nd</sup> Application: Consultation

The applicant sent the BCC a copy of their further revised Proposals, dated December 2007. The BCC considered these further revisions and decided that, in their view, they did not alter the views they had adopted on the original proposal (BCC 411, attached – see appendix B, refers).

### 2.04. Refusal Requested.

The BCC on all occasions requested the Council to **Refuse the Application.**

### 2.05. Objections.

The principal objections to the applications, set out in BCC 388 were:

1. The density was too high to accord with the London Plan and the UDP.
2. Access and Servicing were too close to the Ealing Road junction.
3. Reliance on a poor, over-stretched Public Transport system would generate additional traffic.
4. The impact on Lots Ait and the unsuitability of planning new housing next to a working boat yard. The scheme was not designed to protect residents from the high noise level to be expected.
5. The impact on the river frontage.
6. The impact on Kew Gardens and Kew Palace.
7. Impact on Kew Gardens and its river front, which are now UNESCO designated as a World Heritage site. The development would be on the edge of the designated buffer zone.

*The evidence to be presented on behalf of Kew Gardens will deal with these objections.*

**See also Appendix A Fig 1 and Appendix B Item 3: letter from Kew Society.**

8. The lack of views through the site.
9. Problems of privacy and light within the development.

## 2.05. Objections (continued)

10 Flat roofed elevations facing the river contrary to TLS policy. **(See Appendix B items 4 & 5.)**

11.Objections to height,design and orientation of the building and its# impact on the area.

## 2.06. Context.

The Context of these objections were set out in the Summary Proof of Evidence presented by the BCC to the Inspector at the public inquiry into the application for development at the Scottish Widows Site at Kew Bridge in June 2005.

At para 6 it was stated that "Brentford is under threat. It faces a population explosion without adequate infrastructure. There (were then) 31% more new homes being built than are required to meet the GLA targets and the planning pipeline makes it likely that this level of construction will continue for years to come.

## 2.07. Over-Development in Brentford.

Since 2005, despite the PLI decisions to refuse the proposed developments at Kew Bridge (257 units) and at Commerce Road in 2007 (992 units), other developments are proceeding:

|   |             |
|---|-------------|
| Wallis House  | 755+ units  |
| More are contemplated:  |             |
| Estates Gazette estimate for the Brentford Town Centre development. | 1,150 units |
| Alfa Laval (about)  | 550 units   |
| Thames Water Development  | 375units    |
| Total   | 2,830 units |

In addition:

|   |               |
|---|---------------|
| Pre applications discussions for a second scheme for the Scottish Widows site are proceeding: (about) | 175 units     |
| The residential content of the Commerce Road site could be established at the current BAAP            | not known     |
| Total Development Potential (about)   | 3,005 units   |
| Equivalent to additional population   | 7,125 people. |

(figures subject to confirmation by LPA)

## **2.07 Over Development in Brentford (continued)**

We believe the threat of over- development continues and that any development in Brentford should be seen in this context.

## **SECTION 3.National and Policy Guidance.**

### **3.01. Supplement Evidence by Mr Peter Eversden: Proof BCC 002,**

The evidence presented by Mr Eversden in his supplementary proof BCC 002 should be read with this proof and its appendices and with the other supplementary proofs to this inquiry.

3.02. Mr Eversden deals particularly with National Guidance and Policy and its implications for this site (paras 2.1.1/2.1.5 refer).

AND

3.03 With the London Plan Policies, including revisions and supplementary planning guidance and the implications for this application.

AND

3.04 Concludes (para 3.1) that: "The development proposed for the site at 41 High Street, Brentford, would not meet the planning requirements of national and regional policy for housing density, privacy of occupants, amenity space and context sensitivity (and that) Planning permission should be refused"

#### **4.0 Blue Ribbon Policies.**

4.01. Mr Nigel Moore, Chairman of the Brentford Waterside Forum and waterside advisor to the Brentford Community Council has prepared evidence (BCC 003) attached considering the Blue Ribbon policy in the London Plan and its effect on the proposed application. BCC 003

4.02 His conclusion is that the application is contrary to the Policy and that it should be rejected.

#### **5.0 The Experience of Living in a Similar Development.**

5.01. Mr Stephen Browne is the Secretary of the Holland Gardens Residents Community and a member of the Brentford Community Council. BCC 004

5.02. Holland Gardens is the Capital West project, built just to the east of the application site. It also faces the Thames and Kew Gardens across Waterman's Park.

5.03 The similarities between Capital West (Holland Gardens) and the application scheme by the same developer and the same architect make his evidence particularly relevant.

5.04. He concludes that the practical faults apparent In Holland Gardens recur on the application scheme and that the application scheme further suffers from reduced parking provision, over development and poor design and that the application should be refused.

## **SECTION 6 ACCESS, TRAFFIC AND PARKING ISSUES**

### **ACCESS.**

#### **6.01. The Brentford High Street/Ealing Road Junction.**

The Martin Vorhees (MVA) report on traffic measures in Brentford, adopted by Hounslow Council and subsequent traffic advice, rely on the Brentford High Street/Ealing Road junction to filter a proportion of the east to west commuter traffic away from the Brentford Town Centre.

The traffic lights at this junction allow the proportion of traffic proceeding west down the High Street to be separated from the traffic turning north onto Ealing road up to the A4.

These controls can be adjusted to provide capacity for additional development in the town centre and on other sites between the town centre and Syon Lane.

The development sites include Commerce Road, where a proposal for 992 flats was recently refused on appeal.

Traffic was a major concern at that appeal, as if the development had been allowed, traffic movements would have been so heavy that an "all red phase" to allow pedestrians to cross London Road would have been impossible.

The future of these High Street sites west of Ealing Road may be determined by the on-going inquiry into the Brentford Area Action Plan.

#### **6.02. Application Site Frontage.**

The frontage of the application site on Brentford High Street extends from a point 18.5 meters west of the centre line of the junction to a point 3 meters west of the centre point.

The whole of the frontage is so close to the junction that traffic cannot park without totally obstructing west bound traffic coming from Kew Bridge or the Ealing Road.

Presently the whole frontage has a single yellow line. If shops or offices and/or housing was developed on the site a double yellow line would be required to stop parking or stopping on the frontage in the evenings.

### **6.02. Application Site Frontage. (continued)**

It is noted that local lock up shops and supermarkets are open till 10pm or 11pm. This regulation would need proper enforcement.

### **6.03. Access onto the High Street.**

The Council granted planning permission for 30 units on this site, which the BCC believes would have caused congestion and safety problems.

There is an existing crossing and access point to the site at the western end, but this is less than 18.5 meters from the centre line of the junction. and well within the queuing lines waiting for the traffic lights

The current application is for 69 flats + shops/offices.

It will require parking or stopping including:

- 55 cars parked in the basement
- 69 cycles parked in the basement

And provision for:

- Resident visitor parking
- Shop/office customer parking
- Shop/office staff parking
- Servicing to the flats and commercial frontage.

***No stopping or parking can be allowed on any part of the frontage.***

### **6.04. Access to the Basement Car Park.**

The access shown on the application site uses the existing crossing and a roadway 4 to 6 meters wide. The gates are shown too close to the highway to allow space by the entry control. No footpath is shown.

The roadway leads to the underground car park for:

- 55 cars
- 69 cycles

Vehicles leaving the site wanting to turn right would have to wait for the traffic lights to stop both the south bound traffic in Ealing Road and the west bound traffic from Kew Bridge to edge across the west bound carriageway.

#### **6.04. Access to Basement Car Park.(continued)**

They would then have to work their way into the queue of traffic waiting for the traffic lights to change to allow east bound traffic to move either towards Kew Bridge (right lane) or into Ealing Road (left lane).

**Appendix A Fig 3** shows a photograph of this condition taken at 9.30 am on April 9 2008, when traffic was light. During the evening rush hour the traffic is far heavier.

***We would ask that if the application is approved it is conditioned to require all traffic entering the site to come from the west. “Left In” and all traffic leaving the site to turn west “Left Out”.***

***We would further ask that that an extensive central barrier is built on and beyond the frontage in the High Street to stop right turns.***

#### **6.05. Thames Side House.**

Thames Side House, adjacent to the application site is an office building, which is currently empty. It has an access about 45 meters west of the Ealing Road junction.

*The BCC considers that the access to the application site should be planned into the future development or restoration of Thames Side House.*

### **TRAFFIC**

#### **6.06. PTAL.**

The PTAL for this site is 3, which indicates a medium level of accessibility, which is low for a site close to a Town Centre.

It is likely that residents would wish to own one or more cars as access to the centre of London and places of employment and entertainment could only be reached by bus and by train involving uncertain connections on each journey.

#### **6.07. Proximity to Town Centre.**

The focal point of the Brentford Town Centre is a convenient walking distance. Plans for the town centre have not yet been submitted, so it is not possible to know what facilities would be provided.

### 6.08. Demand on Public Transport.

There are no published plans to improve public transport for residents on this site. Buses are full at peak hours now.

The BCC requested, at the recent Commerce Road inquiry, that the existing bus depot in Commerce Road should be enlarged and this issue may emerge again at the current Brentford Area Action Plan Inquiry.

However, additional housing and an additional demand for public transport must be expected when nearby sites are developed.

In the immediate locality these include:

|   |              |
|---|--------------|
| Thames Water outline consent, start date not known                        | 375 units*   |
| Scottish Widows 2 <sup>nd</sup> scheme. 1 <sup>st</sup> refused on appeal | 257 units*   |
| Commerce Road at BAAP, 1 <sup>st</sup> refused on appeal                  | 992 units*   |
| Town Centre. At BAAP. Outline consent lapsed)                             | 1,150 units+ |

Total = up to..... 2,774 units

- No of units in last application (subject to LPA
- + No of units anticipated in application confirmation)

***Even though the final numbers approved may be less than this figure a substantial increase in demand must be expected which may not be catered for in the public transport system.***

### 6.09. Cycles.

TfL ask for one cycle space for each unit = 69.

The cycle routes in this area are pathetic. The applicant should be asked for a S 106 contribution, ring fenced to fund improved local cycle routes.

No separate provision is made for motor cycles

### 6.10. Thames Side Frontage.

It is understood that the Environment Agency now request that river side building lines should be set back 8 meters from the high tide line. If this were complied with the footpath could be designed on a generous scale in a landscape setting appropriate to the design guidance in the Thames Landscape Strategy.

## 6.11. Thames Side Footpath.

An extensive river side foot path is an important feature of the plans for Brentford.

### East of the site:

A 2.4m wide footpath west of Waterman's Park is now at high level across the Waterman's Arts Centre site. (**Appendix A Figs 4, 5 and 6**). If that site is re-built the path will be at ground level.

The path is presently blocked at Smith's Hill by a wall and by the Gujo Barge/moorings where the Council officers have recommended enforcement action to remove the obstruction.

### West of the site:

Provision is made in the planning application for a river-side footpath past Thames Side House. (**Appendix A Fig 7**)

The path continues west as an extensive paved area (**Appendix A Figs 8 and 9**) past Ferry Quays.

### This site:

The BCC regret that the earlier consented application for a smaller scheme (30 units) was approved with a 1.5 m path). With the current larger application pedestrian facilities should match those on Ferry Quays.

The proposed path:

Is only 1.5 m wide.

it is crammed into the building behind a colonnade at the base of Smith Hill. (**Appendix A Fig 17**)

It projects over the river (0.75m) and continues along the blind frontage below the level of the garages.

This path is unsafe:

It has blind corners,

Mugging would be easy, especially at night.

It is inhospitable at all times.

Even if a path cantilevered out over the water was acceptable this proposal conflicts with the recommendations of the Thames Landscape Strategy.

(See **appendix B**: letter from TLS Co-ordinator)

***The BCC urge that the scheme be redesigned to provide the set back of 8m generally recommended by the Environment Agency, that a generous footpath or paved area be provided between the building and the river and that the landscape of the river edge be re-designed in accordance with the ecological advice of the Thames Landscape Strategy.***

## **PARKING.**

### **6.11. Parking for the Shops/Offices.**

The proposed shops on the High Street will require parking for staff and visitors at the same time as the residents of the flats are at home. So it will add to the total local parking demand. This cannot be met in Albany Square where pressure on parking is already growing.

Evening parking on the High Street, including visitor parking at The Old Fire Station and Fat Boys restaurants are becoming a problem.

The cumulative effect of residents, visitor, office and shoppers parking may give rise to congestion especially as this site is close to the junction (see **Appendix A Fig 3**) and reference to Access in paragraphs above .

### **6.12. CPZ: Parking Control in the evenings..**

Regulation of evening parking would require a CPZ, double yellow lines, parking restrictions and traffic wardens during evening hours, which are not now provided in this area.

Without these measures through traffic in the High Street may be dislocated.

### **6.13. Parking for residents.**

The Council considers that 55 parking spaces would be acceptable for 69 flats. The BCC would contend that, while this is an appropriate level to discourage excessive commuting, it is unrealistic to assume that it will meet the full demand.

### **6.13. Parking for Residents (continued)**

The application, which includes “luxury” riverside apartments, is likely to produce a far greater level of parking demand.

We would anticipate that there would be a considerable number of residents’ cars parked off site unless restrictions were introduced.

### **6.14. Visitor parking.**

Experience at Holland Gardens suggests that off-site visitor parking will add to the demand for street parking as the practical arrangements to allow visitor access are difficult to operate.

Reference is made to our evidence BCC 004.

On this gated site the gates are shown close to the back edge of pavement. They should be moved 10m into the site to allow visitors to use the car entry system.

Frustrated visitors will add to the on street parking demand.

### **6.14. Servicing.**

It is not clear how the servicing to the flats or the shops/offices can be carried out without parking on the High Street. Parking in this area close to the junction is likely to increase congestion.

## **SECTION 7. DENSITY, HEIGHT AND DESIGN.**

### **7.01. London Plan Density Guidance. (See also BCC 002)**

Our supplementary evidence (BCC 002 para 2.2.2 draws attention to The revisions (Feb 2008) in London Plan policies and to the conclusion that the proposed density for this site should be around 275 to 325 hr/ha with a PTAL 3. The paper prepared by Hounslow (Delegated Report para 7.49/7.55) indicates that the proposed density would be close to 881.8 hr/ha. ***This is nearly three times density the London Plan would consider appropriate.***

If the average preferred density (300 hr/ha) had been adopted the scheme could have been reduced from 5/6 residential floors to 3 or less residential floors, an alternative footprint could have been adopted and generous family accommodation and amenity spaces .could have been provided. ***This is a wasted opportunity.***

### **7.01. London Plan Density Guidance (continued)**

In this scheme the objections to this design include

- Lack of Affordable and Family Housing
- Lack of Amenity Space required
- Lack of sunlight and daylight required
- Privacy
- Excessive impact on the High Street
- Excessive Impact on the River.
- Design incompatible with boat building work at Lots Ait
- Lack of permeability.

***We believe these deficiencies could have been met if the recommended density guidance had been followed.***

### **7.02. Family Housing and Affordable Housing.**

The BCC supports the comments made about the provision of affordable housing and the accommodation for families made by the local Planning Authority.

We regret that the scheme neither provides the proportion of larger units sought in the London Plan, nor the play and amenity facilities which their children would need.

In the absence of any amenity space suitable for young children on site the provision of the family accommodation proposed is rendered useless.

***Any under-provision of family units is particularly unfortunate on this site as it is unique in having the potential for direct safe pedestrian access to Waterman's Park.***

### **7.03. Amenity Space.**

The London Borough of Hounslow requires community amenity space at 25m<sup>2</sup> per flat for one and two bedroom flats. For this scheme this is 1725m<sup>2</sup>.

This proposal only offers 1,400m<sup>2</sup> as community space, all arranged in the central court. Unfortunately this space will not have adequate sunlight (see below). It also has little privacy, being severely over-looked by the residents from the access walkways and balconies over head.

The community space is divided into hard paved areas, mostly used as the access to block A and a raised lawn, which presents problems (see below) of use and maintenance, which may restrict its practical use as a communal amenity.

The proposal does offer additional private amenity space to many flats in the form of balconies. Unfortunately those in block B are rendered useless by the lack of privacy with the access walkways being only 10m distance, and the lack of sunlight due to the mass and orientation of block A.

Those in block A face Lots Ait, which is designated as a waterside employment location. (See the paragraph on Lots Ait below) It will be necessary to remove these balconies to ensure that that Lots Ait is not threatened by future residents from operating as a dry dock in accordance with the local authority's plans.

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#### **7.04. Sun Light .**

The central court will be shaded by Block A on the south side. The guidelines of BRE Digest 209 require that no more than 40% of the floor area should be prevented from receiving any sunlight at all on 21<sup>st</sup> March. No calculations appear to have been offered to checks this, but it will clearly not be met.

#### **7.05 Daylight..**

We note that the windows on the ground floor bedrooms on the north side of block A have an angle of 43 degrees to the horizontal to parapet of block B which means that daylight is inadequate unless tested and proven under the BRE Daylight and Sunlight Test (BRE Digest 209). Given the additional loss of daylight through the walkways and the glass privacy screen described above and the width of block B we consider that they could not pass the BRE criteria.

Similarly windows on the ground floor living rooms and main bedrooms on the south side of block B will have day light obscured by the walkways and privacy screens at only 14m distance.

We are also concerned about the 12 bedroom windows between the walkways and the north face of block A referred to below.

### **7.06. Privacy.**

The minimum distance from windows of bedrooms on the north side of Block A to windows of living rooms on the south side of block B is only 17.4m so that the strange glass screen is definitely needed. However, the clear gaps will allow people on the upper levels of the access walkways to look down into balconies and living room windows in Block B at only 14m distance. These are windows to the principal rooms and it is not acceptable that “affordable” residents should suffer such loss of privacy.

### **7.07. Proposed Height of Buildings.**

We consider that the four floor building (Osier Court) forming the northwest corner of the High Street/Ealing Road junction sets the scale for this site.

We accept that lower buildings, the Mac Donald’s drive-in (1 floor) and the Waterman’s Arts Centre (2 floors) also form part of the urban context, but their built forms are not appropriate for a housing scheme.

We also accept that the high slab block in the mixed height Council Housing in Albany Square might lead to other buildings following that precedent. However, this building is not adjacent to the application site. (**See appendix A fig 10**).

The Inspector’s Report on the Scottish Widows appeal indicated that the height of the immediate neighbours gives the most important guidance for new development on sensitive sites.

The proposed High Street elevation would be about 4.2 meters above the parapet of the adjacent Thames Side House. This increase in height is not appropriate and starts to build up higher and higher precedents for development.

Taken together, the two sites would form a considerable wall separating the High Street from the river.

The BCC opposed the application to increase the height of Thames Side House above the parapet, although that design concept echoed the set back and glazed penthouses of the lower, adjacent, Ferry Lane housing.

### **7.08. Impact on the High Street.**

We support the view of the Hounslow Planning Officers (see delegated report paras 7.41/7.45) who considered that the development is out of scale with its immediate environment on the High Street. **(Illustrated in appendix A, fig 11).**

### **7.09 Precedent for Re-development of Waterman's Site.**

The future of Waterman's Arts Centre is in jeopardy. The Arts Council have withdrawn funds and future plans are unclear. The future of the Arts Centre building may also be affected if it is decided to relocate the centre in the proposed Brentford Town Centre.

In the event that the Arts Centre ceases to occupy its present site the land could be re-developed as a housing scheme. The height and bulk of development agreed on the applications site could then be a precedent for development on other river-side sites, multiplying the adverse effects of this proposal.

The applicant's drawing A1736 206 P5 shows the proposal in the context of the river frontage. **(See appendix A fig 12)**

If this application was approved and became a precedent the river frontage could extend the entire length of the Arts Centre forming a wall of development four times as long as the present application.

### **7.10. Impact from the Thames and Kew.**

I attach (see appendix B) a letter from the Co-ordinator of the Thames Landscape Strategy setting out the way this proposal would affect this reach of the river.

I also attach (see appendix B) a letter from the Kew Society expressing their views particularly on view across the river. **(See appendix A fig 1).**

We concur with these objections and that of the Royal Botanical Gardens Kew, which are being put to this inquiry.

### 7.11. Lots Ait.

Lots Ait is about 45 meters from the site. **(See appendix A Fig 11)**. The proposed buildings on the application site are right on the water edge. Noise reflected across the water from Lots Ait may be very apparent on this site particularly at times when this could otherwise be a quiet environment.

The boat sheds are to be restored for boat building/repairs as part of the proposals to maintain this reach of the Thames as a working river.

***It is important that the application site should be built in such a way that no residents have a right in law to reduce the level of activity on Lots Ait, to restrict working hours or take any measure which would inhibit boat building activity.***

The BCC considered that the best way to achieve this objective would be to recommend the refusal of this application on the ground that any residential development could pose a threat to boat building activity on Lots Ait.

***If the inspector considers that residential development on the application site is incompatible with boat building/repairs on Lots Ait we ask him to recommend that the application is refused.***

***The refusal would be on the ground that the application is inconsistent with boat building on Lots Ait, which is protected in the policies of the Mayor and Hounslow Council.***

However, even if residential uses are considered acceptable, we would ask that the present scheme should be refused, because it does not include those design features which could enable residents to live next to a working boat yard.

These changes would include:

1. Reducing the height of building A and therefore the number of flats facing the river.

We note that the Council gave consent to a scheme for 30 units in 2003 and therefore we assume that a development of this size was then acceptable to the Local Planning Authority.

### **7.11. Lots Ait (continued)**

The footprint of the present application scheme shows about half of the flats face directly onto, or have oblique views of the river. If the scheme was revised to 30 units then only 15 would be exposed to the noise from Lots Ait.

#### 2. Removing All Balconies and Roof Terraces facing the river.

Without balconies the residents would have extensive river views, but would not be so exposed to noise problems.

We note that If the scheme was not reduced, as outlined in (1) above the amenity space provided might be inadequate.

We also note that without the balconies the facade may need to be modified to increase the modelling and diversity looked for.

#### 3. Secondary Glazing + Air Conditioning.

All the windows and walls facing the river directly or obliquely should have sufficient sound insulation to ensure that no external noise problems disturb the residents.

To achieve suitable living conditions this may require air conditioning and amendments to the heating proposals to ensure that the carbon footprint is not increased.

### **7.12. Impact on views from Riverside Path.**

When the river-side path from Kew Bridge to Syon is completed the views along this path will be an essential part of the river-side character.

We consider that the proposed development would be out of scale and out of character when seen in the context of views from this path.

**See appendix A Figs 4,5,6,7,8 and 9.**

### **7.13. Lack of Permeability through the site.**

Old Brentford had many lanes and views to the river. This tradition is still clearly visible in the nearby town centre and the Council wishes to preserve this character in the redevelopment on the South side of the High Street. The Albany House is within this area. Permeability on this site was lost when the present warehouses were built, but we believe that the character of the site should be respected now that complete redevelopment is proposed.

We have long argued that residents are unable to see the river from any part of the High Street. We have looked for views through redevelopment sites. Such a proposal was included in the adopted brief for the Scottish Widows site, although it was not realised in the rejected application. This site, placed at the end of Ealing Road would be one where permeability would be particularly appropriate.

We note the gap created within the site of the adjacent Thames Side House next to the application site. This is shown on the applicant's elevations.

In reality the retaining wall and the upper car park at High Street level prevent any views of the river from the High Street. (**Appendix A fig 14**)

The same problems of levels arise on the application site. If the density of the proposed scheme was reduced (see para 7.01 above) it would be possible to shorten the two blocks shown on the drawings or to re-align the development so as to open up wide river views next to Smiths Hill.

Alternatively a less massive scheme could be designed with the building placed at right angles to the river. An example of this approach can be seen at the nearby Ferry Quays.

### **7.14. Architectural Design: River Frontage.**

The Thames Landscape Strategy (**See Appendix B items 4 and 5**) resists high, flat roofed buildings facing the river. This policy is based on an appreciation that the river presents a diverse and ever-changing appearance as one travels up the river.

This design starts with the disadvantage of being too high and too monolithic, filling the whole frontage with what appears to be an eight storey elevation to the river (existing walls + garage + 6 floors residential), right on the edge of the water. (**Appendix A figs 1 & 13**)

#### **7.14. Architectural Design: River Frontage. (continued)**

The desired diversity is being eroded by a repetition of buildings, usually larger than their predecessors, designed with similar facades, similar floor to floor heights and similar set backs and similar flat roofs.

This building, for example, repeats much of the architectural language used on nearby Holland Gardens designed by the same architects.

**(Appendix A Fig 14).**

In our view far more diversity is required. A lower, more modelled facade, deeper set backs, a more interesting silhouette, and above all breaks in the continuous frontage to the river should be introduced.

One example of such an approach can be seen at the nearby Ferry Quays development, (**Appendix A figs 8 & 9**) where the buildings are predominantly set at right angles to the river, have varying heights, rounded gables and curved roofs.

We are not recommending that that formula should be reproduced on the application site. The design for Ferry Quays is referred to here to illustrate one way greater diversity and a more appropriate scale could be introduced on this site.

#### **7.15. Architectural Design: High Street Frontage.**

We have referred, above, to the need to reduce the height of the High Street facade. To illustrate this point we show the effect of reducing the height by one floor. (See **Appendix A Fig 16:** Architect's drawing no A1736 201 with one floor excised).

At this reduced height the facade contributes to the urban setting of the High Street/Ealing Road junction and the existing height of the Thames Side House parapet.

The impact of this facade on the high street is increased by bringing the upper floor forward of the existing building line.

### **7.16. Architectural Design: Shops/Offices.**

We appreciate that the design of this element will require further proposals. We welcome the set back of the ground floor . (see **Appendix A fig 11**). and regret that the upper floors come in front of the present building line (see para 7.11 above). We ask for a policy to control shop fronts and signs and to include cycle parking on the extended pavement.

### **7.17. Architectural Design: Smiths Hill.**

Smiths Hill is now a fairly narrow and very steep access to the water and to the proposed Thames side path. We believe that 106 monies should be made available to re-design Smiths Hill with better gradients, safety barriers that can be adjusted to launch small boats and appropriate landscaping.

This would probably require an adjustment to the site boundary and the loss of the end of the communal garden and possibly the two adjacent flats at the garden level.

Such a re-design could produce a tangible benefit for the community, which would go some way to offset the disadvantages of the present proposal. (**See appendix A Figs 17 and 18**).

### **7.18. Architectural Design: West Elevation.**

The survey drawings show extensive un-built areas around the site of Thames Side House. This building is presently vacant and the opportunity may occur to consider how these sites could be planned together. For example a joint access might allow the application site to be reached further from the High Street/Ealing Road junction. Additionally parking might be co-ordinated on the two sites allowing the landscaped court within the application site to be naturally drained.

Failing such collaboration it is perhaps inevitable that the gables of the two blocks should have windows overlooking the access ramp for this site and the back quarters of Thames Side House. (**Appendix A Fig 19**).

Also to be regretted is the unresolved western end to the central courtyard.

### **7.19. Architectural Design: Central Court Facades.**

Drawing 1736 204 P6 shows the court elevation of the High Street block. We believe that this elevation (particularly if it was reduced by one floor, as proposed above) could be the basis of an acceptable design using contemporary elements to produce a lively effect based on the introduction of varied housing types.

The elevation of the river-side block facing the court is drawings 1736 205 P6.

### **7.20. Architectural Design: Central Court Facades. (continued)**

It appears that the flying galleries, which are on every level would have obscured glass safety screens so that the whole of this elevation to the court would be effectively be glazed.

This glass wall 10/15 meters from the opposite facade (discussed above) would dominate and over-shadow it. The much of the court would effectively be in shadow for much of the day for much of the year.

*The whole over bearing and gloomy effect would be further emphasised by the central lift tower. This feature is reminiscent of the worst 1930 gallery flats. It is suggested that when other alterations are made to the scheme the whole concept of gallery access should be abandoned.*

### **7.21. Architectural Design: Space behind the Galleries.**

It is not clear whether the cross and end galleries would be glazed on the side facing the atrium Some protection will be needed for safety.

It appears that there is a 5 m gap between the galleries and the building.

*We consider that this dark, inhuman and potentially noisy space is an unacceptable feature.*

It is the sole view for 12 bedrooms.

## **7.22. Landscape Design: The Court.**

The whole of the central court is over the basement garage so planting can only be achieved in raised beds, 600mm deep, which will require artificial watering, drainage capable of handling the sudden bursts of heavy rainfall associated with climate warming and constant maintenance.

Part of the court is over-shadowed for much of the year and part is exposed to more sunshine. It is unlikely that the proposed lawn will remain an attractive feature under such variable conditions.

As the lawn may be heavily used for recreation including children's informal play it is likely to be subject to heavy wear making it even more difficult to keep in good condition.

To ensure that the lawn remains an attractive feature viewed from the flats it would be desirable to ensure that no one walks on it. This would mean that the lawn might be a design feature only and therefore was not a usable communal amenity area.

We are concerned that trees in 600mm planters will have a short life and will need to be regularly replaced.

We are concerned that access to the garden deck for grass mowing, garden care and plant replacement is so restricted. Contractors would have to park in the street (see servicing problems referred to above) and restrict their equipment so it could pass through the narrow entrance passages.

We assume that tree replacement and other heavy work would have to be done by crane lifts from the lower service roadway.

It appears that the proposed garden is a high cost feature with limited usable amenity value.

## **8.0 SUMMARY AND RECOMMENDATIONS.**

**8.01.** The application is an over development of excessive height and density.

**8.02.** The access, on street parking and service proposals so close to the Ealing Road junction are unworkable.

8.03. The footprint of blocks A and B are so tightly planned that they they do not meet the appropriate standards of amenity, privacy, sunlight and daylight. It is likely that a more open scheme at a lower density could meet these standards and provide a better environment.

**8.03.** The proposal, sited opposite Lots Ait would need to be re-designed to ensure that residents would be able to live in the property while boat building and repair work were proceeding.

**8.04.** The proposal would have an excessive impact on views from Kew Gardens riverside, from the emerging Brentford riverside path and from the High Street.

**8.05** The architectural character of the building repeats the style used at Holland Gardens, reducing the diversity of the river front.

**8.06.** The uncertain future of the Waterman's Arts Centre makes the issue of precedent unusually significant.

**8.07 We ask that the application be refused. We also ask that a new brief for development of the Thames Side House, Albany House and Waterman's Arts Centre should be prepared before further applications are lodged.**

### **APPENDICES:**

**Appendix A.** An Urban Design Study.

**Appendix B** Documents and letters.