

Brentford

Community Council

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Mr George Murphy, Case Officer,
Development Control,
Department of Planning and Environment,
Civic Centre, Lampton road
Hounslow TW3 4DN.

ref: Q 20 dmb
April 24 2009

Dear George,

Final Text

**Kew Bridge Road (Scottish widows Site)
Revised Application No: 00657/P/P13/CA1.
Views of the Brentford Community Council.**

1. Introduction.

- 1.1. Thank you for advising us that this application has been revised and that the Council is inviting views on the current proposals.
- 1.2. In June 2008, when the application was lodged, the BCC sent you their views in a letter (ref:Q18). We note that you will not be taking account of comments made at that time and that you will only have regard to those made now.
- 1.3. Accordingly, we are setting out in this letter the views adopted by the BCC at their meeting of April 23 2009. These views were amended and adopted and I now request you to report them to your members.
- 1.4. We would like to thank Mr. Malcolm Wood of St George West London who attended the meeting and answered question put to him.

2. Background.

- 2.1. The BAAP: Since the application was first lodged in 2008 the Council has adopted the BAAP with specific policies relating to this site (M3).

- 2.2 The BAAP (page 31) also sets out as objective 9 the Council's wish to "explore the possibilities of delivering an exemplary sustainable sports stadium (supported by mixed uses) on the east Brentford site known as the "Brentford Diamond" on Lionel Road.
- 2.3 It appears that this project cannot be financed without a significant amount of new housing, currently estimated at 1,200 units located at Griffin Park, The Fountains Centre site and the proposed stadium site. Housing on the stadium site could be in addition to the stadium itself, the replacement Fountains Centre, and any Conference facilities or hotels required.
- 2.4 In view of the significant impact such a development could have The BCC considers that it is vital that decisions on other planning applications in this area, including this application, should take account of the Council's stated objective.
- 2.5 The BCC adopted views in 2008 when the application was submitted. These are summarised in para 9 of our letter to you (Q18, attached as an appendix to this letter).
- 2.4 ***We welcome the amendments that have been made to the scheme, but we consider they still do not meet the objections raised by the inspector to the scheme submitted to the public inquiry nor the objections raised by the BCC in 2008.***

2. Urban Design.

- 3.1. The Urban Development Principles of Site, Policy M3, require that the "scale and massing of new development should take account of the height and setting of the three surrounding listed structures (Kew Bridge, Kew Bridge Steam Museum and Kew Bridge railway station)".
- 3.2. These three key buildings are different in nature; Kew Bridge being long and low, Kew Bridge Station being the size and style of a domestic dwelling, and the Steam Museum combining the tall thin tower with the cubic mass of the engine halls. However, all three present smaller masses in a more open settings than this proposal, which clearly fails this criterion.
- 3.3. The importance of respecting the historic character of the area was reinforced when the Council adopted the Kew Bridge Conservation Area.

- 3.4. The articulation of the current proposal is welcomed. However, it is inadequate to relate the scale and character of the proposed building satisfactorily to the listed buildings and to the conservation area.
- 3.5. ***To achieve this, the whole building should be reduced by one floor in height.***
- 3.6. We welcome those changes which have opened up Kew Bridge.
- 3.7. We re-iterate our request (ref: Q18 para 5.7) that the site should not isolate Brentford High Street/Kew Bridge Road from the river. Q18 (para 5.8) asks that the building “allows views through the building from the High Street/Kew Bridge Road to the River”.
- 3.8. Despite the changes made the application remains an un-inspired design, which we consider is not worthy of a site of such exceptional importance.
- 3.9. ***In respect of Urban Design, we ask that the application be rejected.***

3. Family and Affordable Housing.

- 4.1 The amended scheme provides no four bedroom units as required by London Plan targets. The scheme should have an appropriate proportion of larger family units and include suitable amenity spaces for all on site. Additionally on-site play space for children should be generously provided, particularly as the site is in an area of open space deficiency.
- 4.2 The amended scheme has no affordable housing. In the Three Dragons Toolkit used to justify this omission the applicant (who was present at this discussion), erroneously compared the Residual Value of the site with the Acquisition Cost, rather than with an Existing Use Value calculated from the last permission for the site as commercial offices.
- 4.3 We think it unlikely that affordable housing would really make the scheme non-viable, even in the present financial climate, and if this were the case, we would propose that planning consent is deferred until sufficient affordable housing is included to meet the needs of key workers and low income residents.
- 4.3 ***A scheme with inadequate family accommodation and no affordable housing should be refused.***

5. Access and Parking.

- 5.1 The application fails to dedicate land for the improvement of the Kew Bridge junction, which is over-loaded and has a record of fatal accidents.
- 5.2 Parking for existing residents is inadequate. Insufficient parking for those working on the site and in the arches is proposed. Stress on local parking is likely to become still worse if the Brentford Community Stadium, which is identified as an “objective...to be explored” in the BAAP, is carried through and completed.
- 5.4 BAAP policy to encourage cycling has not been promoted by improved cycle routes across the Kew Bridge junction.
- 5.5 Cycle parking does not meet current TfL standards. The basement provision is cramped and has difficult access that will make it unsafe at peak times.
- 5.6 Pedestrian routes across the site have been omitted
- 5.7 The servicing drawings show that traffic has to enter the site down the side of Kew Bridge (a difficult and dangerous maneuver), that delivery vehicles may clutter the forecourt, pass over, reverse and park on “pedestrian-only” spaces and cause congestion on the access road to the under-ground car park.
- 5.7 Drop off taxis are permitted to make a right turn into Kew Bridge Road while all other vehicles are required to make a left only turn into Kew Bridge Road or go through the Campus West site. As there is no central reservation it is likely that vehicles will in fact make right turns, blocking the road at the approach to the busy and dangerous Kew Bridge intersection.
- 5.8 ***Even without the possible development of the Brentford Community Stadium this scheme provides further pressures on the over-crowded road system, inadequate on-site parking for cars and cycles and an access pattern which could conflict with pedestrians on site and exacerbate congestion around Kew Bridge. If the stadium project proceeds the conjunction of these two schemes near Kew Bridge could only increase these problems.***

6. Riverside Uses.

- 6.1 The BAAP calls for a boat club to reinstate the Horseferry Rowing Club building. ***We ask that the public house building should be re-designed to incorporate a rowing club.***

- 6.2. The BRN policies require adherence to the SUDS principles for drainage, which the current proposal apparently ignores. The uniformly non-absorbent surfacing of the entire flood absorption area does not comply with this policy. The landscaping should comply and be water absorbent.

7. Summary and Recommendation.

- 7.1. The BCC considers that the amended scheme (2009) has only addressed some of the Urban Design issues raised in the 2008 submission and none of the wider planning questions.
- 7.2. The BCC considers that any major scheme which fails to provide a range of family housing (including four bedroom units) and which also fails to provide housing for key worker and low income families is unacceptable.
- 7.3. Since 2008 the BAAP has been adopted, including a stated objective to “explore the possibility” of locating a new Brentford Community Stadium at Lionel Road. We consider that the application fails to meet the problems of access and parking, which will enable it to operate before the stadium is open, and which would lead to further congestion if it is built..
- 7.4. The BAAP was adopted after the canoe club in the Kew Bridge arches was opened. It specifically asks for a replacement boathouse on site. We ask that the public house building should be re-designed to include a boat house as stipulated.
- 7.5. ***We consider that the amended scheme fails to meet the BAAP brief for the site and should be refused.***

I would be grateful if you would note that this letter has been amended since the draft was sent to you. Its amended text has been adopted by the members of the Planning Consultative Committee meeting on April 23.

Please will you advise your members of these formal views of the Community Council.

Yours sincerely

attached as Appendix: Q18

Denis Browne,

Chairman, Planning Consultative Committee,
Brentford Community Council.