

THE STRAND ON THE GREEN ASSOCIATION  
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19 July 2008

Planning Department  
London Borough of Hounslow  
The Civic Centre  
Lampton Road  
Hounslow TW3 4DN

For the attention of George Murphy

Dear Sirs,

Land at Kew Bridge Road, Brentford  
Your ref. 00657/P/P13 & 00675/P/CA1

1. I write on behalf of The Strand on the Green Association, having been deputed to do so by The Association's Executive Committee.
2. We note the application for the development, which is a revised submission of the Application that was the subject of an Inquiry in 2005, and of the Inspector's Report dated 1<sup>st</sup> December 2005. We make reference that Application (which we refer to as KBR1) and to the findings in that Report in this letter.
3. We are of the view that the current Application demonstrates very considerable improvements over KBR1, in terms of exterior design, context sensitivity, vehicular access, provision of public open space and many other features in which the previous design was deficient, and the developers and those retained by them must be congratulated thereon. If, having considered all representations (included those contained in this letter), the relevant planning authorities are mindful to approve a development of this type and scale, this proposal commands our reluctant support. However, we still have a number of objections and reservations which, with other issues raised by other parties, we hope would lead to the rejection of this application.

Density and Scale

4. Despite the undeniable improvements over KBR1, we consider this development to be of too big a scale and too dense a development for this site. In his Report,

the Inspector made reference to the London Plan (2004 version) and in particular to Table 4B.1, and using an Urban setting and a PTAL of 3 (but on the cusp between 3 & 4 – para 3.78)<sup>1</sup>, he considered an appropriate density would be “towards the lower end of the range 450-700hr/ha” (para 9.64). We would interpret that as somewhere between 450 and 550hr/ha. Since that time, the London Plan has been revised, and the 2008 version contains Table 3A.2, which indicates an appropriate density for Urban site of 200-450hr/ha (for PTAL of 3) or 200-700hr/ha (for PTAL of 4), if anything suggesting an even lower range for this site – perhaps 450-500hr/ha.

5. We understand that the density of the current proposal is 658hr/ha (which we trust will be carefully checked and verified by planning officers), which in our view is well in excess of what the Inspector and the current London Plan deem “appropriate”. While density in itself may not be sufficient grounds to reject an application if what is proposed has considerable merit, there comes a point (recognised by the Inspector – para 9.67) where “a proposal is too large even for the most skilled architect to overcome the negative effects of sheer size”. We would contend that that remains the case with this development.
6. “Urban”, in the London Plan (2008) para 3.23, is described as “typically buildings of two to four storeys” as, with the exception of two converted office buildings, is the area surrounding this site. In our view, for this development to be truly context sensitive, its scale should not be markedly different from its adjacent buildings, and thus should be limited in height by removing at least one of the full-footprint floors (e.g. the third floor). This would have the effect of bringing the density closer to the range deemed “appropriate” by the quoted authorities. This would also seem to more closely meet the policies set out in the Brentford Area Action Plan (Site M3 – see page 26).

#### Building Height

7. We are concerned that the submitted drawings do not have the heights of roofs, etc, clearly expressed in heights above OD. This makes enforcement of the plans difficult, if not impossible.

#### Historic Views

8. The Inspector placed great emphasis on the preservation of historic views, in particular of the Kew Steam Museum stand-pipe tower. It is one of the very few remaining examples of Brentford’s historic commercial past, and an excellent example of Victorian industrial design. Of particular importance are the views from the Strand on the Green riverside footpath, and we have not seen an illustration which shows the impact of this design on that view. Those that are represented do not in our opinion preserve the views to an adequate degree.

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<sup>1</sup> Rather than rely on the Applicant’s estimate of PTAL for the site, which has been shown to be erroneous in the past, we would encourage planning officers to seek confirmation of the current figure from TfL.

### Restoration of Boat House

9. A condition for the demolition of the old boat house on this site was that it should be replaced when the site was re-developed. The Applicant has supported the conversion of one of the Kew Bridge arches to a canoe club, and this is to be welcomed. However, the arches are not part of the site being developed, and this provision does not satisfy this condition.

### Parking

10. We remain very concerned at the impact that this development will have on the already problematic parking in Strand on the Green, Spring Grove, Hearne Road and Green Dragon Lane. We are also extremely concerned that the whole ground floor is taken up with commercial use, and that a new riverside pub is included on the site, whereas there seems no parking provision of users or those working in these premises, or for visitors to the residential accommodation, which can only add to the pressures on parking in this area. We repeat our request that when, in due course, CPZs are introduced in these areas, no provision should be made for occupants of or visitors to this development.

### Accommodation Provided

11. We do not comment in detail on the accommodation provided in this development, as it is not a matter of direct concern to the Association. However, we would support the points made by the Brentford Community Council regarding the lack of larger units of four bedrooms and above. We are also surprised that a number of the units, in addition to being of very small size, appear to have very inadequate window provision.
12. In summary, although this proposal shows great improvements over that submitted in the earlier application, we are still of the view that it should be refused.

Yours sincerely

John Ormsby