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BCC784 **DRAFT.**

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Dear Shane'

**Ref Gillette South, Syon Lane.**

The Planning Consultative Committee of the BCC have reviewed the application for this site and representatives have visited the site, the post application exhibition and the recent public meeting and they have asked me to write to you to send you our views and to request that you incorporate them into your report.

**1. Member's Site Visit,**

1.01. Members of the planning committee are drawn from all parts of the borough. This application is for the development of an exposed site close to a Listed Landmark building.

***We request that you arrange for members to visit the site with the officers before they determine the application.***

**2. Previous Consultations.**

2.01. The site is outside Brentford, but as a tall building is proposed on the boundary with Osterley it does have an impact on the Brentford area.

2.02. The BCC were not advised by the Council officer's nor by the applicant that they were consulting residents, despite the fact that their Design and Access Statement (D&AS) relies on the relationship between this site and the "Golden Mile" concept which may be the basis for future development east of Syon Lane.

2.03. Thanks to the intervention of OWGRA and of ward councillor, Toni Louki we have now been advised that an application has been made and that our comments could be considered.

### 3. Context and Character.

3.01. Local Plan Policy CC1 makes it clear that "the NPPF requires that Local Authorities should develop policies rooted in an understanding and evaluation of an area's defining characteristics".

3.02. In response Hounslow has "established 232 character areas which include those north and south the A4 west of Syon Lane.

3.03. In these areas ALL the development consists of two floor semi-detached houses with steep roofs. No development above the ridge lines has been permitted. The houses have front gardens, which are large enough to permit planting, which would somewhat mitigate the high levels of air quality pollution and noise associated with a heavily trafficked dual carriageway.

3.04. The D&AS makes no reference to the character areas in Osterley but relies on the scale of the higher buildings in Brentford to justify a design which is out of character with everything to the west of Syon Lane.

3.05. The A4 rises steeply from Boston Manor Road to Syon Lane, which will result in any high building being seen from all angles and from long distances,

3.06. As there is already a landmark building at this exposed junction ANY building on this site should be kept to three floors which is equivalent to the height of the listed Gillette Building on the north east corner of the same junction.

3.07. This would leave the protected and well loved Gillette clock tower as the only LANDMARK in this conspicuous location.

3.08. The planning brief for this application has clearly ignored the Local Plan (Policy CC1) notes on page 131 which states that "context can be defined as the way in which places sites and spaces interrelate...."

3.09. Clearly this application fails to "interrelate with the development to the west or to the need for the setting of the listed Gillette building to predominate and for any new development which affects its setting to be subservient to it".

***The proposed design is unacceptable. The site should be developed with 2/3 floor buildings which do not rise above the ridge lines which have been established for all the development to the west of the site, This discipline would ensure development which related to the adjacent character Area and was acceptably subservient to the listed building.***

#### **4. Building Heights.**

4.01. Policy CC3 states that "We will expect tall building development proposals to (i) be sensitively located and be of a height and scale that is proportional to its location and setting, and carefully relate and respond to the character of the surrounding area.

4.02. Clearly this building has ignored the design and character of its neighbours.

4.03. It might be possible that a building which respected some aspects of the character, scale and materials of its neighbours might have been acceptable.

4.04. But this building does not. (Policy CC3 (m) relate heights to widths of spaces to achieve comfortable proportions not (p) take opportunities to enhance the setting of surrounding heritage assets, over all skyline and views"

4.05. Instead as the Design and Access Statement says (Introduction para 1.1) the scheme is intended to create "a Gateway building which marks the start of The Golden Mile"

4.06. Policy SV1 states that "the council will work with the Mayor of London and neighbouring authorities to define and implement a strategic economic concept"

4.07. No further detail was included in the Local Plan as adopted in 2015 as that had been found to be unsound by the inspector after his public inquiry.

4.08. Instead the cabinet authorised a Review which is now due to be completed in 2018/9.

4.09. In the mean time the application stands to be judged against current policies. It cannot be approved as a "Gateway" to a proposal that has not been examined approved and adopted.

***Judged against the approved development plans the application is a "departure" which should be rejected.***

#### **5. Density.**

5.01. The site is defined in the Local Plan Volume 2 (page 271) as Site 25 Osterley and Spring Grove - South West of Gillette Corner.

5.02. The site area is given as 0.39 hectares with a Ptal of 2 (poor).

5.03. The proposal is for a mixed development (D&AS p 77) with:

Storage	7400 m2
Offices	740 m2
Residential	7,500 m2 (approximately)
Total	15,640 m2.

5.04. In a mixed development the SPG guides towards measuring the residential density on the fraction of the site area allocated to it.

5.05. This would produce an equivalent site area of 0.2 hectares. On this basis the residential density with 323 habitable rooms would be

5.06. 1,615 habitable rooms per hectare (150/250 hr/ha is recommended in London Plan).

5.07. Even assuming that this reduction in the residential site area is not appropriate because the proposed storage is a passive use and because it is underground, the site area of 0.39 with a PTAL of 2/3 on a suburban site would be 810. Over three times the recommended maximum.

5.08. Although it is accepted that density is only a measure of the suitability of the proposal, excess density is often associated with unresolved design problems.

5.09. It should be noted that most of the adjacent development is built with wide frontages and front gardens against the major roads fronting the site, giving a much lower and more appropriate density.

## **6. Design Measures to Mitigate Local Conditions.**

6.01. The site is on the south side of the 7 lane dual carriageway A4 at its junction with the busy Syon Lane.

6.02. Right turning lanes have been introduced into the junction for traffic turning off the A4 onto Syon Lane.

Vehicles turning right onto the A4 have to wait for gaps in the traffic.

6.03. At rush hours and busy periods there is considerable traffic congestion with vehicles discharging exhaust, noise and dirt.

6.04. As a consequence the site is heavily polluted and unsuitable for residential development.

6.05. The proposed design has attempted to provide most units with at least one room protected from this pollution and most of them also enjoy exposure to the sun.

6.06. This has been achieved by cross-over duplex apartments, which is appropriate, although it does result in long artificially lit access corridors and many bedrooms where the windows cannot be opened.

6.07. Unfortunately the building comes very close to the back edge of the pavements so that there is little attenuation.

6.08. Amenity provision (3,400 m<sup>2</sup>) is provided on balconies and the roof of the storage loading facilities, which will be over-shadowed by block B.

6.09. There is no provision for under 5s, for older children or much for passive enjoyment. In reality the roof garden will improve the view from the flats above.

## **7. Access**

7.01. All the houses close to the site have provision for private cars.

7.02. This application provides 42 spaces. The site has very poor Access to Public Transport (PTAL2). Those without cars will have to walk or cycle through this very dangerous environment.

3.03. Cyclists using the Cycle lanes parallel to the A4 have been killed by turning traffic. At the junction itself the position is more dangerous.

3.04. There appears to be no "all red phase" in the signal giving pedestrians priority to cross these wide roads and any improvement would reduce the capacity of an already over-loaded junction.

3.05. It is possible that the Department of Transport may envisage major improvements. Some improvements along the A4 were indicated in the minister's reply to a recent question from Ruth Cadbury.

7.06. If such improvements required additional land they might require a part of this site.

## **8. Conclusion.**

8.01. Brentford is shown in the Local Plan (p 35) on the Spatial Strategy Key Diagram as an area of "significant growth" but the diagram for Spatial Strategy in Brentford (page 41) does not clearly show development west of Syon Lane.

8.02. The same plan does show Syon Station as a "new/Improved station".

8.03. When the station is improved as part of "the fundamental change in the accessibility of the (Great West Road) area by public transport, improving the visual environment, including a reduction in advertising clutter and retaining the commercial character as well as improving the connections to Brentford Town Centre (Local Plan p 40 para 3).....when that has been secured desirable residential (area 9 of the diagram) might follow and this could then lead to a new approach to residential development on the application site.

8.04. The plan for the Great West Road awaits the Review of the Local Plan, the planning studies and the planning briefs which will need to follow.

8.05. In the mean time the boundaries and the character of the proposed Great West Road development has yet to be established and the present application must be assessed on the basis of the adopted plans.

***On this basis the application should be refused.***