

# The GLA Planners' Report on the Gillette South Application

The application to develop the former Shell garage site at Gillette South constitutes a major development. As such it required consideration by the GLA Planning Section, the officers of which have produced a report supporting the proposed scheme in every major aspect except that of affordable housing. We are very concerned that this report shows many signs of having been produced without the care and attention required to evaluate the proposal for a such a major development. There are a number of alarming issues with the report, of which some of the main ones are briefly addressed below:

1. **“On” the Golden Mile.** The report repeatedly states that the site for the development is “on the western end of the Golden Mile”. In fact it is just beyond the western end of the Golden Mile, which ends at the junction of Syon Lane with the A4.

The large commercial buildings which make up the Golden Mile and form its particular character *start* from the Homebase building on the eastern side of the junction (facing the proposed site on the other side of the road). From the western edge of the junction there is an abrupt change of character to one which is dominated by low-rise (mostly two storey) housing.

This area with its low rise housing, poor public transport (see later) and considerable distance from a town centre is a classic suburban development as defined by the **London Plan**. Throughout this report, however, it is constantly described as if it were instead an urban area.

2. **“The site is situated a short distance from Brentford and Isleworth town centres”.** We wonder how this astonishingly incorrect claim (in para 7) ever came to be made. The site is more than 1800 m walking distance from both town centres which in terms of the London Plan is definitely not a “short distance”. We do not understand how the GLA planners could make an assumption of this magnitude.
3. **“Providing a strong landmark building”** (para 8). This location is not in need of a strong landmark building. It already has one in the Gillette building and the attempt to provide another situated inappropriately amongst low rise housing both detracts from the Gillette building and clashes with the adjacent housing.
4. **“Public transport access to the site is good”** (para 9). The report claims good public transport access and claim that it has a PTAL of 3. In fact the TfL map show the site very clearly to have a PTAL of 2. Given that there are nine levels of PTAL from 0 to 6b with three being the fourth from bottom it is not clear why even level three is described as “good”. Be that as it may this site has a PTAL of 2 which is definitely not “good”. In addition the authors of the report seem to be unsure about their claim since (for example in para 24) they say that the site has a PTAL of “2 to 3”.
5. **“12.4% of the Borough's annual monitoring target”** (para 18). The proposed scheme would be for one and two-bedroom units (over 90% in fact). The borough's clearly stated highest need is for large family homes. Therefore the quantity of units proposed needs to be matched with the character of the units required. This point is lost in the report which (in para 20) merely states that the scheme “would provide a range of unit types from one to three-bedroom dwellings”.
6. **The site “can be regarded as having an 'urban' setting”** (para 24). The report says “based on the characteristics of the site it can be regarded as having an 'urban' setting” but it fails to tell us what those characteristics are. In fact in terms of the *London Plan* it very clearly has a 'suburban’ setting. That setting is low rise housing, poor public transport and no easy access to

a town centre. This incorrect characterisation impacts directly on density calculations using the London Plan density matrix. It is another aspect of this report where it seems that an accurate description has been avoided with the aim of giving general approval to the scheme for which the only issue is deemed to be the absence of affordable housing.

According to the report the building “will need to respond to the contrasting aspect of the Great West Road to the north west and suburban residential neighbourhood to the south east on Northumberland Avenue”.

It is important to note that in this paragraph the authors of the report recognise the suburban nature of the residential neighbourhood in which it would be situated whereas *they* have elsewhere claimed that the setting is urban.

It is therefore quite wrong to suggest that the London Plan suggests an indicative range of 200-450 habitable rooms per hectare. A location with a suburban setting and a PTAL of 2 (and even 3) has an indicative range of 150-250.

We understand that an “indicative range” is just that and not a rigid rule. At the same time it has to mean something. It is conceded in the report (in para 25) that densities outside the indicative range would need to be justified by “exceptional circumstances”. However, the report makes no effort to demonstrate such exceptional circumstances and merely asserts that “In this instance the mixed use scheme provides a good approach to accommodating commercial and residential uses” and that “the scheme is located on the Golden Mile” (it is not) “where tall and larger buildings are located”. From that it is concluded somehow that “the proposed density is considered to be acceptable”.

Everything seems to us to be wrong with this reasoning. First, if density is a consideration then having a mixed use should lower the appropriate density for housing units rather than raise it. Second, the development is just beyond the Golden Mile and not on it. Third, the building is situated directly among low rise housing. Fourth the building does not blend in even with those on the south of the Golden Mile (such as the Homebase building which is nearest to it). It is much taller than those buildings with only the Gillette tower being higher.

In a suburban area with PTAL 2 (same as the application site), the maximum number of units is 80 per hectare (see relevant reference highlighted in London Plan Table 3.2 below). Given that this site is only 0.39 hectares, we conclude that **the maximum number of units consistent with the London Plan, without exceptional circumstances being demonstrated, would be 32**. This development proposes 102 units i.e. **an excess of nearly 200%**.

7. **The applicant “has demonstrated that the building will not be overbearing”** (para 33). No reference is given to where the applicant has done this and with good reason. The applicant has done no such thing but instead has merely asserted that the building will be harmonious with the adjacent housing because it steps down towards it. Only a brief acquaintance with the housing at this point along the Great West Road and a look at the images and scale of the proposed development are required to see how unjustified this assertion is. We would make the same point about the claims in paragraph 34 about *the* appearance and materials of the proposed scheme.
8. **“GLA officers are of the view that the proposal ... would not harm the character or setting ... identified within the applicant's heritage and townscape and visual impact assessments”**. We believe that this is entirely wrong and that the applicant has not made a convincing case. This issue has been dealt with in the objection to the application by Paul Velluet.