

Shane Baker,  
Development Control,  
London Borough of Hounslow

By email.

July 14 2017  
Ref: BCC 810

Dear Shane,

**Pre-Planning Application: Block D, South Side of the High Street, Brentford.**

The Brentford Community Council ("BCC") has considered this application and they have asked me to write to you.

**BCC is not opposed to the proposal in principle, as the provision of social housing by the Local Authority is something that we wish to support, but we do wish there to be amendments to the scheme whilst under consideration and prior to the granting of consent. Owing to the increased height of each of the three blocks compared with the outline consent envelope, we wish to see the reduction by one storey for each block with the top storey of the north block being set back. We also suggest amendments of detail to deal with the 'cliff' appearance of the north block to the High Street, as set out below. We have concerns about the viability of the retail space, and call for an up-to-date review of the retail needs of Brentford District Centre. We are also concerned about the servicing of the retail units. We also have serious concerns about the process followed in this case and the lack of public consultation.**

## **1. Background**

1.1 This important site is a key element of the main Ballymore masterplan schemes prepared by architect AHMM. The site has the benefit of an outline planning consent but this is a stand-alone application and does not rest on the outline consent. The proposal for Block D is purely for social housing and retail to the ground floor. Block C immediately to the west of this block has detailed planning permission.

1.2 The proposal is intended to provide 96 units in three blocks, North, East and West with a mix of 1-bed, 2-bed, 3-bed, and 4-bed units, including four duplexes on the top levels of each block. The outline planning permission set out the content and general configuration in three blocks. This application is similar but the three blocks have been increased in height from the permitted scheme by a storey in each case, although these additional storeys do not

cover the whole floorplate, with the additional floor on the north block being set back from the High Street for visual amenity. The blocks will therefore comprise ground floor retail with 7 storeys of residential accommodation over that. Residential entrances are to each side of the overall scheme.

1.3 The blocks are to be set back from the existing building line by about 3 metres to achieve a wider pavement on the High Street. The scheme will create retail to the ground floor of each block, to the whole of the north block on the High Street, to most of the West block on Bradbury Yard, which will be pedestrianized, and to the northern end of the East Block on Catherine Wheel Yard. Servicing of the retail units of the North Block is by means of a trolley-way to the rear of the block or from the two side streets. The original scheme with outline consent retained the NatWest building frontage and the retention of this may be considered.

1.4 Parking and servicing are by road from the south of the scheme and will provide access to a common yard including 20 car spaces, of which 10 will be for disabled users. There will be 132 bicycle racks.

1.5 Above this yard will be a podium garden for common use. There are balconies on many units generally facing west. There are some small private gardens providing screening for privacy from the communal area. Duplexes on the top floors of each block will have private terraces. The East and West blocks will be 17m apart.

1.6 The external material has not been settled but is likely to be brick with some use of precast stone on the north elevation of the North Block.

1.7 The services for the scheme have not been finalized but it should be possible for the blocks to become part of a wider CHP scheme. The provision of solar panels will also be possible.

## **2.0 General comments:**

2.1 **BCC does not object to the scheme in principle or request its refusal, as the provision of social rented housing is important to the area, but wishes to see certain amendments as set out in this letter.** BCC wishes to congratulate the Local Authority for developing social housing, particularly as the scheme includes larger units which provide family homes for which more provision is needed.

## **3.0 Visual amenity and daylight:**

3.1 BCC has concerns about the additional storey on each block compared with the consented outline scheme for the site. These additional storeys would result in a loss of visual amenity and the loss of daylight to the High Street and neighbouring blocks. **BCC therefore proposes that a storey be removed from each block** to revert to the envelope of the scheme which has been granted outline permission.

3.2 BCC is also concerned about the visual impact of this proposal on the High Street. It is agreed that the existing pavement is too narrow and the increase in width in this section is welcomed. Although the original plans envisaged that the lower scale NatWest Bank and adjacent Post Office building would be retained to keep a familiar and human scale to this part of the High Street, it is recognized that it is unlikely to be financially viable to rebuild these structures on the new building line. BCC therefore proposes that other measures should be taken to break up the overpowering cliff effect from the north block on the High Street. Furthermore, the north building as now proposed is one floor higher than the adjacent block C buildings, which are at right angles to the High Street so mitigating any 'cliff' effect. The Block D north block should certainly be no higher than the proposed Block C buildings adjacent. For these reasons, **BCC proposes that the height of the north block is reduced by one complete floor (as also set out in 3.1 above) and that the set-back proposed for the top of the building is retained on the new top floor.**

3.3 The elevation to the High Street of the north block is shown slightly articulated by changing the window shapes. **BCC proposes that the central third of the block is set back by say one metre**, so that the façade is not a continuous wall **and that the facing material of the central third contrasts with the rest.** The use of brick and render proposed for blocks B and C should be that used generally on block D.

#### **4.0 Retail space – quantum, viability and servicing:**

4.1 The amount of retail space proposed appears to be similar to that envisaged in the outline consent, but there was concern at that time about the amount of retail floor space that Brentford could sustain, given that it is difficult to buy a large amount of goods or bulky goods when travelling by bus or bike and parking is limited. Additional retail has also recently been approved for the Essential Living development.

4.2 There remains also concern specific to this application about the provision of a significant amount of retail space in secondary locations on the side streets, which could result in unlet units or low-grade use which would detract from the amenity of the blocks and the wider area. With no car parking available in the scheme, the retail could only be for convenience or A3 use.

4.3 **BCC therefore proposes that the London Borough of Hounslow should commission an up-to-date evaluation of the retail floor space needs for the District Centre** including the amount of retail space in secondary positions.

4.4 With respect to this proposal, the shops will have to be serviced from the trolley passage off Catherine Wheel Road or from the street itself. There is not adequate space for goods vehicles to unload in this narrow street. This part of the proposal needs to be reconsidered and **BCC proposes that all servicing is provided within the site**, possibly from the general service area.

## 5.0 General amenity:

5.1 With regard to play spaces, it was noted that the two rear blocks are only 17m apart. Two closely spaced high parallel blocks are likely to produce poor daylight particularly in winter months, lack of privacy and high noise levels from the playground on the podium, although this is mitigated to some extent as most of the units are dual aspect. **The slight reduction in height of the blocks that BCC proposes will ameliorate the daylight problems to some extent.**

## 6.0 Process:

6.1 **BCC objects in the strongest terms to the lack of proper public consultation in this case** and seeks London Borough of Hounslow's full reassurance that this extreme haste and the absence of any proper consultation process is not repeated and is not regarded as a precedent for any application of any kind in future. Guidance on London Borough of Hounslow's own development applications emphasise the need to follow procedure and take all decisions openly. The short notice and inadequate consultation timed close to the proposed submission in this case does not appear to accord with the spirit of the Act.

Yours sincerely

Denis Browne  
Chairman, Planning Consultative Committee

cc Stephen Browne (Chairman BCC)  
Dianne Page.