

**Brentford East SPD:
Consultation Response.**

November 2017
BCC 826

The Brentford Community Council has considered the Draft Brentford East Planning and Design Supplementary Guidance Document (SPD) and has agreed these comments.

The references are to the page and paragraph numbers in the SPD. References to the GW Corridor Preferred Option Document are (POC)

1. General Comments.

At page 2 para 5 the role of the SPD is defined as being “a material consideration to help determine decisions on planning applications within its boundary”

The BCC has received presentations and written to the Council with our views on most of the individual major sites within the SPD boundary.

We are pleased to note that this draft has been led by an Urban Design approach, which aims to bring the potential of these sites together.

2. Improving Transport and Access.

At page 16 para 3.19/3.22 the SPG report notes the poor PTaL, the strain on Gunnersbury Station and the rail service changes which will not significantly improve capacity at Kew Bridge Station.

As is explained more fully in the Great West Corridor Preferred Option Consultation Document, (POC page 70) development in all parts of the Corridor including Brentford East depend on “game changing improvements” to public transport.

The major improvement for Brentford East in public transport envisaged in the Corridor plan would be the proposed station at Lionel Road. (POC page 72 Fig 4.6).

It is understood that this station and the rail link to Old Oak Common would have a lower priority than the proposed Shuttle and would therefore not be operational until a later date.

We note that no substantial improvements to public transport in Brentford East can be expected before the Great West Corridor Local Plan Review has been completed, tested at public inquiry and adopted.

Congestion at Chiswick roundabout and at Kew Bridge is already severe. Any additional traffic could result in gridlock.

The BCC has recently been consulted over the proposed Cycle Superhighway 9. We note that the proposed route would reduce capacity for other vehicles.

The London Plan relates the capacity of development sites to PTaLs

The BCC agrees with the view that improvements to public transport are fundamental to any major development in any part of the Great West Corridor.

As no significant improvements to public transport can be operational before the Great West Corridor is due to be adopted it must follow that the SPD should not be a “material consideration” before the Local Plan Review has been completed and adopted.

3. Density of Development.

The SPD has been drafted in advance of the latest review of the London Plan which is expected to go out to consultation at the end of November 2017.

It is understood that at the last London Plan review Hounslow officers asked that the Great West Corridor should be designated as an Opportunity Area. This was refused by the inspector at that time but it is possible that it may be included in the latest proposals. In that case the designation would need to go through consultation and public inquiry, with adoption at least a year ahead.

In the meantime the SPD, if adopted in 2018 would be supplementary to the Local Plan 2015 (without the GW Corridor Review).

The density of development for applications in the short term should therefore be related to the adopted development plans. Any applications exceeding these constraints would be departures and should normally be refused.

The BCC urges the Council to promote development which accords with adopted plans.

4. Air Quality.

The Mayor has adopted policies to reduce pollution in Central London which can be extended to other parts of London. The BCC are aware that the whole of Hounslow is a area of high pollution and that the levels of pollution close to the North Circular and the A4/M4 corridor are the highest in the borough.

We have noted that Council proposals for sites on the A4 have attempted to promote non-residential development. At the North West Quarter the Council varied this policy to allow an "employment led mixed development" which achieved 51% non-residential by including hotels and the developer's own regional office.

The BCC has consistently asked the council to refuse residential proposals adjacent to the A4 and the North Circular Road.

We note that the consultation document on the Great West Corridor, Preferred Option (POS page 85 Figure 5.4) promotes residential and mixed use development on sites screened from the A4 by barrier office blocks.

The BCC support the proposal illustrated on SPG page 37 showing a continuous barrier of non-residential frontage along the A4 and North circular roads, including the site of the Chiswick Curve for which a planning application for mixed use development was recently refused consent .

We still await specific evidence that residential development sited behind barrier blocks will have significantly improved air quality but the indications are that a plan organised on these lines could make a welcome contribution to the health of residents.

5. Building Heights.

SPD paras 4.25/29 set out recommended building heights for all the sites in Brentford East.

We welcome the proposal (paras 4.28/9) that sensitive frontages should have lower buildings than those behind.

The draft does not give reasons why the heights specified are appropriate. It would be helpful if the background papers could be attached as an appendix so that, if the SPD is adopted, these limitations could be defended at appeals.

We are concerned at 6/8 storey development facing Gunnersbury Park and Gunnersbury Cemetery has been proposed. These buildings would dominate these open spaces.

6. Gateway and Landmark Buildings

SPD page 29 Figure 4.3 shows three sites for landmark or gateway buildings.

Virtually every application which has been submitted for sites close to the The A4 has asked to be recognised as a landmark building.

In our view this concept has led to a series of buildings which have each sought to distinguish themselves at the expense of their neighbours.

We welcome the Urban Design concept behind this SPD, but would oppose the inclusion of any further landmark/gateway structures.

7. Fountains Leisure Centre.

Page 45 paras 5.28/33 gives guidance for redevelopment for Fountain Square without reference to the need to re-provide the Fountains Leisure Centre, which is thought to have a life of about seven years.

The present Fountain Leisure Centre is well used. With the population set to grow by at least 2,500 (housing around the Brentford Community Stadium) the demand for these services is likely to increase.

If the centre was rebuilt on its present site the area would be without this facility for several years.

The Plan for Brentford East should be centred around a new Fountain Leisure Centre.

8. Managed Urban Design.

When a Brentford East SPD has been adopted we propose that the Council should set up a three dimensional CAD model of the whole area so that integrated designs for the public realm and landscape can be developed.

It should also be possible to insert the detail design proposals for each new development within Brentford East so that the Planning Committee could see how any application would fit into the general plan.

9. Summary.

We think that this Urban Design led study is a useful design tool. However we think that it is premature, as traffic constraints are severe and cannot be improved before the Local Plan Review for the Great West Corridor has been submitted to a public inquiry and adopted.

The draft SPD should be submitted to the public inquiry with the Local Plan Review.