

Brentford East Draft Supplementary Planning Document (SPD): Consultation Document

Comments from the West Chiswick and Gunnersbury Society

These comments should be read in conjunction with those submitted on the Great West Corridor Local Plan Review; Preferred Options.

General The reasons for progressing this SPD in advance of the completion of the Great West Corridor (GWC) Local Plan Review are understood. Its preparation as an interim measure is supported with the important proviso that, once the GWC Local Plan Review is complete and incorporated into the Local Plan, this SPD must be reviewed and wherever necessary, revised to ensure its compatibility with the updated Local Plan.

In particular the quantum of proposed development within this SPD will need to be brought in line with that included in the Local Plan once the GWC Local Plan Review is considered sound and adopted. We would request that this is explicitly stated within this SPD. We consider that the very high levels of proposed development currently included in the SPD and in the Preferred Options is unsustainable.

The cumulative amount of recently built and consented development in and around the Brentford East area is very significant and has taken place without any real infrastructure improvements. This lack of essential infrastructure, especially transport, already has a negative impact on the quality of life of those living and/or working in the area. The completion of the consented schemes will worsen this impact.

The Council must desist from yielding to the temptation to put the cart before the horse. Any more major development in this area will be unsustainable unless and until the necessary infrastructure has been delivered. We request that this SPD makes this clear by direct reference to Policy IMP3 (h) “ensuring that development does not proceed unless the delivery of critical and necessary infrastructure to support that development is assured”. Without such a commitment, development on the scale envisaged will be unsustainable. It certainly will not support “vibrant and healthy communities” (2.2) within the new developments. Moreover, it will undermine these attributes of the established communities in the surrounding area and their ability to enjoy the “natural, built and historic environment”.

We object strongly to the designation of the GWC as an Opportunity Area (2.7) as we do not believe that it can sustain the quantum or type of development such a designation entails. This objection is strengthened by the inclusion within the Brentford East section of peripheral areas not part of the core corridor. While some of the sensitivities of these peripheral areas are addressed within the draft SPD, we fear that such distinctions would be overridden by the Opportunity Areas imperative to deliver very high levels of development.

3. Study Area

Much of the study area covered by this draft Brentford East SPD falls outside the core Great West Corridor. The peripheral areas indicated below are not considered suitable for the type of transformation/ scale of development envisaged for the main corridor. We do not object to them being included within this SPD provided that explicit reference is made “up-front” in 3.1 to the peripheral/special nature of these areas in order to strengthen any provisions given in later sections of the SPD.

Area east of the Brentford Stadium Scheme and west of the Chiswick

Roundabout (includes sites KF KG and KH in Fig 5.1 of Capacity Study) The massive scale and very high density of the development associated with the Brentford Stadium was dictated by the need to pay for the stadium. The permitted size of the residential blocks already brings the scale of the buildings of the A4/M4 corridor to the north much closer to the sensitive heritage areas to the south and east. The southern corner of the triangular site intrudes into the historic townscape and into the setting of the River Thames and its associated heritage landscapes and buildings. The significant negative impact of this development on the surrounding heritage, low-rise residential areas, traffic and public transport was acknowledged but these Departures from the UDP were considered to be justified by the “community” benefit of the stadium.

The stadium scheme was presented as an exception, a unique case; it must not be used as a catalyst for yet more large-scale development on neighbouring sites. What is needed in this area is modest development that seeks to mitigate the harm inflicted by the stadium scheme, that fully respects the sensitive, low-rise surroundings and heritage and seeks to redress the balance. Any such development should provide the social and community infrastructure sadly lacking in the stadium scheme.

Power Road estate (includes sites KK, KL, KM and KN in Fig 5.1 of Capacity Study) The Power Road estate is located beyond the main artery of the Great West Corridor; it is located in Chiswick and lies between Gunnersbury Avenue (North Circular) and the Chiswick High Road. We recognise that the estate’s position in relation to both the Great West Corridor and the Chiswick Business Park supports enhancement of its role as a "creative hub" for SMEs. We would support sensitive regeneration of parts of the estate provided that full account is taken of its proximity to the residential properties within both the Thorney Hedge and Wellesley Road Conservation Areas.

[Figure 3.1 *Note* Points of interests – 3 Chiswick Business Park (so as not to confuse with Chiswick Park, a nearby tube station or the grounds of Chiswick House); 8 M4/A4; 9, 10 & 11 not shown on map.]

3.6 Thorney Hedge Conservation Area Reference should be included to the short but significant part of this CA on the Chiswick High Road which forms the hub linking this Conservation Area to that of Wellesley Road. It includes the Gunnersbury pub and the parade of shops. Reference is made to the importance of these mixed commercial/ domestic Victorian buildings both in the original proposal for designation as a Conservation Area and in the Conservation Area Character Appraisal Report.

Fig 3.3 If Chiswick House CA (2) is identified, why not Turnham Green CA which is as close to the study area and is contiguous with Wellesley Road CA (7)?

3.8 and 3.9 We agree that poor air quality will remain a major issue but we do *not* agree that the design mitigation to which reference is made offers an acceptable solution. We believe strongly that the very high levels of noise and air pollution make much of this area totally unsuitable for residential development. We have made this point in submitting comments on applications for several major developments within the Brentford East study area. For example, in 2016 in comments on the proposed development on land at the Chiswick Roundabout, we stated:

Meanwhile, measures proposed by the applicant to mitigate air and noise pollution for future residents of the development (eg locating residential on 6th floor and above and replacing balconies with winter gardens) only address the internal environment of residential units. Whenever residents leave the building they will be exposed to the unacceptable environmental conditions of this site. This will militate against the residents adopting active, healthy lifestyles including active travel modes (walking, cycling) or engaging in social interaction. The concept of a development where residents are encouraged to remain confined indoors is reflected in Travel Plans that are *inter alia* designed to... try to reduce the need for people to travel in the first place (by provision of broadband internet to every dwelling to enable home working, online shopping). **Leading the sedentary, socially isolated lives thus envisaged will be detrimental to the physical and mental wellbeing of residents and to community cohesion. How can our Council reconcile such a dystopian forecast of life in the 2020s with the vision of our recently adopted Local Plan?**

Placing residential development behind a “buffer zone” or protective barrier of commercial buildings might offer a solution on certain sites where the site area and configuration permits.

With the cumulative amount of recent and consented development in and around the study area and the lack of any **guaranteed** improvement to public transport, pressure on the highway network is likely to increase for the foreseeable future. This would be significantly exacerbated should a 3rd runway be built at Heathrow. Placing confidence in the motor industry to reduce emissions is a high-risk strategy.

3.11 We agree that Chiswick Roundabout marks a distinctive change in the pattern of development; see comments under 4.34.

3.12 The large green space of the Chiswick Roundabout with its informal tree cover is a positive feature which softens the influence of the character-deforming presence of the M4 flyover and the intrusive presence of the LED digital screens. Plots of “leftover space” around the roundabout are important public realm buffer spaces; they should be considered as extensions of the green space of the roundabout. Soft landscaping improvements could provide visual interest and/or help to combat noise and air pollution, especially for residential properties on south/south-east side of roundabout (Chiswick High Road, Surrey Crescent, Clarence Road).

3.13 Elegant logos identifying the owner/occupier of a commercial building can provide legibility and interest. Large media screens that pay no respect to their surroundings can have a very negative impact.

We recommend that Policy CC5 of the Local Plan and GWC3 would benefit from the provision of an Advertising SPD to provide further guidance taking account of the significant changes to the scale of adverts and the technology employed (eg large-scale LED-lit digital media screens).

3.14 -3.18 Agree that much of the study area is characterised by barriers and a very hostile pedestrian/cycling environment.

3.21 While outside the study area, **Gunnersbury Station** provides the only access to Underground and Overground services to developments within Brentford East. It is a major transport hub linking these rail routes and local public and private (eg Sky) bus services. The current situation at peak hours is beyond “strain”; the station is already unable to address demand adequately. The situation in the morning peak is extremely unpleasant for all concerned – those struggling in the crush to leave the platform, those being delayed from accessing the platform* and the unfortunate TfL staff on the front line having to cope with all this stress and frustration. * These passengers (mainly residents travelling to work elsewhere) are the most seriously affected as delayed access often means missing the intended train with subsequent late arrival at destination. Significant upgrade is needed for the station now.

3.22 Increasing bus route frequencies may not be feasible or offer any real improvement as, according to TfL, reliability of local services is compromised by traffic congestion, especially at the Chiswick Roundabout.

Building Heights

3.24 Delete “ranging from 7 to 16 storeys” at the end of this paragraph. See comments on Building Heights in Section 4 below and those in WCGS comments on policy GWC5 P1, P2 and P3 in the GWC Local Plan Review: Preferred Options document.

4. Urban design principles and approach

4.1 Urban Design Principles

Land Use As noted above we maintain that there is only limited scope for more residential development within the study area. Development should be employment-led.

An essential land use within this area must be the provision of community infrastructure to include, in particular, a leisure centre to replace and extend the facilities currently provided by the **Brentford Fountain Leisure Centre**. With the quantum of recently built and consented high-density residential development within and close to the study area, such an expanded facility will be essential to facilitate and promote active life-styles. We recommend that a reference to this use is included here.

Arrangement of uses Agree with principle of shielding residential uses but this should be extended to sites bordering other noisy and polluted roads such as North Circular (A406) and the A4.

Public realm Strongly agree with principle but see no evidence of its application in consented developments in study area or at neighbouring sites. The London Housing SPG states “Urban spaces are most successful when it is inherently clear who is meant to use them. It is important to ensure that outdoor spaces are inviting and accessible, and that they engender a sense of ownership amongst the people who are intended to use them. There should also always be clear distinctions between spaces that are for public and private use.”

In commenting recently on the revised Brentford Football Stadium residential scheme WCGS stated:

7 Central Southern As far as the quality of life for future occupiers of the 256 units in residential Blocks E and F are concerned, the opening of the space between them and its conversion to shared pedestrian/vehicle public space and gateway to the stadium is, in our view, likely to have a serious negative impact. The various coding diagrams provided show this space as the route for “Public Pedestrian Circulation over Concourse”, “cycling route” and “Pedestrian Concourse-Emergency vehicles, refuse, delivery and car park access”. It will also be used by team coaches on match days.

Building Heights

Building Height Approach

This section of our comments should be read in conjunction with our comments on GWC3 Design and Heritage and P3 Great West Corridor East Place Policy of the Great West Corridor Local Plan Review: Preferred Options Consultation

4.1 – 4.6 We fully endorse the **Key Townscape Issues** spelt out under Building Height Approach in the Brentford East Capacity Study Report [box on page 67] and recommend that they are reproduced in full within the SPD.

We also fully support the conclusions in the section of this Report on the Sensitivities to Tall Buildings, *for example* (1) “Given the world importance of The Royal Botanic Gardens, it is unacceptable that tall or over-scaled developments should continue to invade the setting through a process of accretion following “one off” decisions.” and (2) “continued building at such a scale, adding to the Brentford Stadium bulk would be extremely damaging. It would threaten to swamp the delicate relationship of water, buildings and sky. Future development should allow the [Strand on the Green] Conservation Area to retain this lyrical relationship.”

Key comment 1: We consider that the starting point for the approach in this SPD should be that, so much damage has already been done by tall buildings or is “consented”, the Brentford East area is in general an unsuitable location for any more. As noted above under Section 3, the permitted size of the residential blocks of the Brentford Stadium scheme already brings the scale of the buildings of the A4/M4

corridor to the north much closer to the sensitive heritage areas to the south and east. There should be a clear acknowledgement of the damage done by recent tall buildings such as Kew Eye in the Central Section of the Great West Corridor. There should be both a recognition that we are at a “tipping point” and a strong commitment to valuing and protecting the surrounding heritage assets.

4.14 – 4.20 Scattered approach We agree that this is totally unacceptable.

4.21 – 4.24 Co-ordinated approach We consider that this approach might be acceptable but only if the height, location and number of tall buildings is strictly controlled.

Key comment 2: We wished to broadly endorse the strategic principles and the hierarchy of one Gateway Landmark of not more than 60 metres, possibly two Corridor Landmarks of not more than 48 metres and of "layering" other buildings at lesser heights. However, on closer inspection, it is clear that this strategy is based on incorrect data with respect to the heights of the consented residential towers of the Brentford Stadium Scheme and of at least one existing landmark building. The SPD indicates that 48 metres “reflects the approved heights of the stadium scheme”. This error may have arisen from making assumptions about height based on storeys. It will be essential to remove or modify *all* statements basing strategy or thresholds on this erroneous context (see, *for example*, 4.39, 4.40).

As set by the Design Code parameters, eight of the 12 residential blocks of the consented Brentford Stadium Scheme are 50 metres or higher and of these 8, three are 60 metres or more. [The remaining four are between 33 and 46 metres.] Vantage London is 62 metres high.

This means that setting a maximum of 60 metres for the Eastern Gateway at Chiswick roundabout must be based solely on this being the maximum permissible in terms of harm. Judged in terms of height, it will not be the most significant structure in Brentford East and there will be several buildings that are not subservient to it (4.41). Its Gateway status must therefore derive entirely from its strategic location, its exceptional architectural and design quality and from ensuring that its setting is not compromised.

The stadium scheme towers need to be plotted onto Fig 4.5 to make it clear that Brentford East is already over-supplied with “landmarks”.

See comments on specific principles below.

Principle 1: Acceptable building heights

4.25 We recommend starting this “In General” paragraph by stating that “Tall buildings should be the exception rather than the norm, when considered in the predominantly low to medium rise fabric of Brentford East and its surroundings (as in Principle 7) and taking account of the sensitivity of the architectural and natural heritage assets of local, regional, national and international significance.”

This could then be followed by the current text of 4.25 which we support, provided that Footnote 1 is deleted. Explicitly exempting the Eastern Gateway Landmark at the Chiswick Roundabout from these requirements is dangerous and unnecessary; reliance should be placed on Principle 2.

4.26 We support the setting of a general **maximum** height of 24 metres but not use of the term “blanket” as this could be misconstrued as a minimum or norm.

We request that the text is amended to read:

In Brentford East building heights for both commercial and residential should be within a general range of heights of between 12 to 16 metres (equivalent to 3 - 4 commercial or 4 - 5 residential storeys²) at the lower end and between 16 to 24 metres (equivalent to 4 - 6 commercial or 5 -8 residential storeys²) at the higher end.

Two ranges for the general height are given in policy P3(f) of the GWC Local Plan Review: Preferred Options document; we have requested that these ranges are modified as shown here. Without the above amendment the sentence “Solutions at the lower end of this height scale...” makes no sense. Deletion of “other than...below³” together with footnote 3 is considered essential – see Key comment 3 below.

We strongly recommend spelling out in this paragraph that within Brentford East tall buildings of more than 24 metres will be limited to:

- one Eastern Gateway Landmark building at Chiswick Roundabout as defined in Principle 2 and shown in Figure 4.3 [maximum height of 60 metres for a slim component of the building, the rest stepping down]
- no more than two Corridor Landmark buildings as defined in Principle 3/ 4 and shown in Figure 4.3 [maximum height of 48 metres]
- a very limited number, if any, “local tall buildings” as defined in Principle 3/4 and layered as defined in Principle 5 [maximum heights of **36 metres** and dropping in accordance with Principle 5]

and that maximum heights lower than 24 metres will apply to sites within the areas described in 4.28 to 4.30.

Footnote 3 Key comment 3: We strongly request the removal of this footnote. Permitting such exceptions would totally undermine Principle 1 and the entire strategy on building height. Having, as a result of detailed study and analysis, identified the three sites within the study area where a taller building *might* be appropriate, the Council should not allow any additional exceptions. See also comments on Principles 3 and 4 below.

4.27 We support the need to reduce height of buildings on southern side of public/private amenity spaces.

4.28 Chiswick High Road and Gunnorsbury Avenue We agree that the interface with the existing and neighbouring lower-rise urban fabric on these two roads must be treated very sensitively. This urban fabric contains established residential

communities and falls within Conservation Areas. We recommend that this section is split into two.

The ground-floor of any developments along the relevant section of the **Chiswick High Road** should be commercial to provide an active frontage and to reflect the uses on the opposite side of the street. We request that the wording is modified to specify “a maximum height of 16 metres equivalent to 4 commercial or 1 commercial plus 4 residential storeys at the street frontage in An additional 1 commercial or 2 residential storeys may be acceptable, provided that the total height is not more than 20-22 metres, and if appropriately ...streetscape.”

Any development along the relevant section of **Gunnersbury Avenue** (the North Circular) should be non-residential as outlined in Arrangement of uses. We request that the wording is modified to specify “a maximum height of 16 metres equivalent to 4 commercial storeys at the street frontage in An additional commercial storey may be acceptable, provided that the total height is not more than 20 metres, and if appropriately ...streetscape.”

4.29 Gunnersbury Park and Gunnersbury Cemetery We endorse the need to pay full respect to these very sensitive areas of Metropolitan Open Land. Reliance cannot be placed on the screening provided by the existing tree cover as, apart from the effectiveness of the screening being seasonal, a significant proportion of the mature boundary trees within the MOL may be removed within the next 15 – 20 years. Some have already been felled and others may need to be removed due to disease or because they are reaching the end of their natural life span. The incidence of disease may increase and the life span of trees may decrease due to the impact of pollution and climate change. Replacement trees will not provide the same amount of screening. We therefore request that a maximum height of 12 metres (equivalent to 3 commercial or 4 residential storeys) is specified and that only one additional storey may be permissible, where set back appropriately.

We would also request that a minimum distance of 12 metres from the MOL boundary is specified for the building line.

4.30 Power Road The Power Road estate is an important area located between the main artery of the Great West Corridor and the Chiswick Business Park. If its role as a "creative hub" for SMEs is to be enhanced, we need to celebrate its heritage. Any new development needs to pay full respect to the best of the surrounding buildings, such as Power Road Studios and Chiswick Studios, attractive buildings of heritage value, which the Society will be nominating for local listing as good local examples of Art Deco industrial architecture.

We endorse the overall approach proposed for the height and scale of buildings in the Power Road estate. We strongly agree that the relatively fine grain and intricate character of this area should be respected and that the impact on the residential properties of Thorney Hedge Road must be limited.

We would request that the “opportunity for additional increase in height to up to 24 metres” is not applied at the **corner with Chiswick High Road**.

A recent development proposal at this corner (application 00248/B/P22) has now been approved for a building of “three storey to the front of the site with the fourth set back towards the rear. The total height would be 16 m (12 m to front).” The set-back was agreed partly in response to the Society’s comments on this application. We emphasised that the high road east of the roundabout is the gateway to Chiswick town centre and is characterised by an important residential component. The residential properties opposite the site are within the Wellesley Road CA. WCGS has made clear its objection in principle to development at the Chiswick Roundabout that would increase the influence of the character-deforming presence of the M4 flyover and the rest of the major road infrastructure. Height and design cues should be taken from 630 Chiswick High Road, a sympathetic, well-articulated brick building Together with the refurbished houses on the opposite corner, views of this building contribute very positively to legibility and context.

Allowing a building of 24 metres at this corner site would also compromise the setting, legibility and landmark role of the “Eastern Gateway Landmark” proposed for the site at the roundabout (see Key comments on 4.21- 4. 24 above).

Principle 2 Gateway to the Golden Mile

4.31 The Chiswick Business Park is “beyond” not “at” the eastern end of the Great West Road and is not part of the Great West Corridor.

4.32 We strongly endorse the Golden Mile as a prime employment hub.

While seeking to create “arrival moments” for those travelling on the A4/M4, equal care and attention needs to be paid to the experience of those who live in the surrounding streets (see comments under Principle 6 and 7 below). As we stated in our February 2017 comments on the proposals for a major development within the study area:

The buildings might be seen as amusing or interesting additions by those to whom they are an occasional, brief encounter when travelling on the M4. To those who would have to live with them on a daily basis, they would be seen as an alien and alienating, out-of-scale, overbearing intrusions as they would to those for whom they would appear as a totally incongruous element on the skyline.

4.33 – 4.38 We agree that the vacant triangular site at the Chiswick roundabout provides an opportunity to provide a building that is notable and outstanding – a “Gateway Landmark” because it is of the highest architectural and urban design quality. We fully endorse Key Townscape Issue 2.

Key comment 4: It is imperative that landmark status is defined in terms of quality to deter proposals that seek to achieve such status by being the tallest in the area (see Key comment 2 under 4.21 – 4.24 above). We would strongly support setting a maximum height of 60 metres for this building. The SPD must make it absolutely clear that this maximum is based on the conclusion of the Capacity Study that:

Only the lowest height scenario (59m) is judged as not having a significantly adverse impact on the heritage setting within the tested sensitive views.

4.36 We would request that, rather than simply setting a maximum height of 60 metres and indicating that “height could be concentrated on the western side of the roundabout”, some further intermediate height restrictions are placed on this site in recognition of the sensitivity of its surroundings, both in terms of heritage and low-rise residential townscape. We consider it essential that the 60-metre maximum is confined to a slim element of any building on this site. See especially Kew Townscape Issue 2.

In commenting on the proposed development at this site in February 2016 we suggested that:

A building based on the footprint design of the current application but with the two main elements of the building being no more than 36 and 48m (9 and 12 commercial stories) with perhaps a slim, elegant element of no more than 60m might fit the bill. As far as the Golden Mile is concerned, what we need is a full-stop, not an exclamation mark!

Footnote 1 The information in this footnote is incorrect and appears to be based partly on the **refused scheme** described in application 00505/EY/P18 which is to be **the subject of a Public Inquiry in June 2018.**

No approval has been given for a building at this site with any residential component.

The approved scheme at this location (application 00505/EY/P5 granted in September 2002) is for a 13-storey office building of maximum height 59 metres. [A later approval (application 00505/EY/P14 granted in September 2012) for the “Octopus” (show-room, offices and shroud with media screens) has lapsed.]

Since the uses are not fixed, it is preferable to delete any reference to storeys.

4.37 Any development at this site should respect its full context and its multiple “gateway functions”. It should serve to mediate between the very different scales of the Golden Mile and that of the other routes meeting at the roundabout. While the Golden Mile is indeed to be celebrated, it is not, and must not become, the defining feature of the wider area. Any building at this site must not only “do justice to the special character of the Great West Corridor” but also do justice to the surrounding heritage assets and residential communities.

As we pointed out in February 2016

Chiswick Roundabout, is the meeting place for several major roads and should be seen in its full context, namely (going clock-wise), as the gateway to:

- Gunnersbury Park and Ealing (Gunnersbury Avenue, North Circular, A406)
- Chiswick (Chiswick High Road, A315)
- Brentford and Kew (Chiswick High Road, A315/A406 leading to Kew Bridge Road and Brentford High Street, A315 and Kew Bridge, A205)

Principle 3: Tall building Height Thresholds and Principle 4 Special Landmarks

4.39 – 4.47 Key comment 5: Together with Footnote 3 under 4.26, the statements under Principles 3 and 4 remove effective control of building height within the study area. By allowing an unspecified number of “special landmark buildings” to be up to 48 metres in height, these Principles, as written, would undermine the entire strategy. Promoting multiple landmarks debases this once useful urban-design concept. Getting lost in a dense forest of tall building clusters will alienate rather than promote a sense of place.

We believe that, taking account of the number and height of existing and consented tall buildings within Brentford East (see Key comment 2) and the acknowledged harm to the surrounding heritage, the only sites within the study area where buildings *might potentially* be permitted to be above the maximum height of 24 metres are the three identified, namely the “Eastern Gateway Landmark” at Chiswick Roundabout (4.33) and the two “Corridor Landmarks” (4.45).

Any “additional building of distinctive character” (4.44) should rely on its design quality for distinctiveness. It should conform to the maximum/blanket height of 24 metres in Principle 1, unless, in exceptional circumstances, it can be demonstrated that an increase in height above this threshold is fully compliant with Principles 5, 6 and 7 and does not compromise the setting of the Eastern Gateway Landmark or of either of the Corridor Landmarks (See 4.46, 2nd bullet). In any case, such a building should not exceed **36 metres** in height.

4.45 Corridor Landmarks The proposed sites for the two corridor landmarks fall either side of the consented Brentford Stadium scheme (sites KA/KE and NE end of site KF, Figure 5.1 of Capacity Study). They should seek to counter the influence of the dense clusters of high-rise buildings of the latter scheme. Competition from the nearest residential blocks of the stadium scheme - either the Duffy site (55 and 61 metres) or the Central Eastern site (57.5 and 60.5 metres) will need to be overcome by means of outstanding architecture and imaginative design.

- When designing a corridor landmark for the site adjacent to the proposed **Lionel Road Station**, great care will be needed to prevent harm to the historic, built and natural assets of Gunnersbury Park. The area around the Potomac Lake and southern boundary mature trees is one of the most important in terms of nature conservation and biodiversity; see GWC4 (i) in GWC Local Plan Review: Preferred Options document.
- Any corridor landmark at the **inside corner of the M4 at Capital Interchange Way** will need to respond to both the Eastern Gateway Landmark and Vantage London and be very sensitive to Gunnersbury Cemetery and the Katyn Memorial within it.

Fig 4.5 The stadium scheme towers need to be plotted onto this diagram.

Presentation We find the text provided under Principles 3 and 4 confusing and the apparent distinction between “corridor landmarks” (4.45), “special landmark buildings”, “tall buildings not classified as landmark sites” (4.42), “other tall buildings” (4.39) and “additional building of distinctive character” (4.44) difficult to interpret.

We strongly recommend that the text of these two subsections is merged into one simplified Principle “**Height Thresholds for buildings other than the Eastern Gateway Landmark**” (dealt with in Principle 2) and rewritten in light of the above. It will be essential to remove or modify *all* statements basing strategy or thresholds on the incorrect height of consented buildings, *for example*, 4.39, 4.40. (see Key comment 2 above).

Terminology should be rationalised viz Eastern Gateway Landmark, Corridor Landmark and, if relevant, subsidiary or local tall building.

Principle 5 Hierarchy and layering

We support adoption of this principle with the proviso that any tall buildings, other than those at the three identified landmark sites, should not exceed **36 metres** in height. We would, however, point out that this principle has been seriously breached by the residential blocks of the Brentford Stadium scheme which will introduce buildings of over 50 metres close to the sensitive heritage areas to the south and east (see Key comment 2 above). This breach needs to be acknowledged; it makes strict application of this policy for future development imperative.

Principle 6: Legible townscape

4.49 We agree with this principle but recommend that a different image is chosen to illustrate it. The image in Fig 4.7 is a fine example of the terrible consequences of not applying this principle. The off-centre Kew Eye building represents a jarring contrast even with the medium-rise new development in the foreground. When viewed from within the adjacent low-rise neighbourhoods (see photo on page 26 of the GWC Local Plan Review Preferred Options document), the change in scale is brutal. It appears as an alien intrusion, demeaning and belittling the intimate human scale and destroying the sense of place of the established townscape.

This building has also harmed the settings and views from high grade heritage assets, especially within the Royal Botanic Gardens, Kew (see Capacity Study Report) and Syon Park.

Principle 7: Integrate with surroundings

4.50 We agree that the interface of tall buildings with the public realm is very important and that tall buildings should rise out of a wider, low-rise or medium-rise podium or street block. If this is not feasible, it suggests that the site is unsuitable for a high-rise building, unless the impact can be mitigated by a different design solution.

While providing interest to those travelling on the elevated section of the M4, all buildings along the Great West Road within Brentford East also need to provide an appropriate and sensitive response to the A4 streetscape below. They should assist in mitigating the very negative impact of the overhead motorway on the public realm along this section of the A4.

5 Development Framework

Land uses 5.1 – 5.7

5.4 We agree that residential uses should only be provided in locations where all the stated conditions are met. We would draw attention that this includes “where high quality indoor **and outdoor amenity** (our emphasis) can be guaranteed”. See comments under 3.8 & 3.9 above.

The benefits of outlooks over Gunnersbury Park for residents must not be at the expense of harm to the character and value of the park. See comments under 4.45 above. Biodiversity can be negatively impacted by loss of light/sun during the day and/or light pollution at night. Unlike commercial premises, large residential buildings – assuming they are occupied – create light spillage and light glow since the internal lighting of residential buildings is difficult to control.

The Brentford Stadium and the associated residential towers will negatively impact views toward the Thames from sites to the north of it. Issues of noise and light pollution will also need to be addressed for such sites.

5.6 We do not agree with providing any residential development along main corridors. See comments under 3.8 & 3.9 above.

5.8 We agree (see comments under 4.1). It is requested that the SPD identifies where within Brentford East a new and extended Leisure Centre should be located.

5.9. Account must be taken not just of development within Brentford East but of the large amount of development recently built or in the pipeline for the wider Brentford area. There is already an infrastructure deficit. The lack of any new infrastructure associated with the already approved development in Brentford East will lead to a deterioration in the quality of life of existing residents. The quantum of further development proposed in this SPD will be totally unsustainable without guaranteed simultaneous delivery of the necessary community **and transport** infrastructure. See comments under **General** above.

Better connections 5.10 – 5.13

We support the proposed improvements but note the complexity and need for collaboration of multiple stakeholders (5.11). It would be advisable to get initial agreement in principle from responsible authorities such as TfL and Network Rail for the proposed routes. The routes could then be promoted to prospective developers at an early stage. Contributing to the delivery of the identified new routes should then be required for all relevant developments.

Route A We strongly support the provision of this route. It will also require enhancement to the pedestrian environment in Power Road. This section would then provide an attractive pedestrian link from West Chiswick and Gunnersbury to Gunnersbury Park, avoiding the Chiswick Roundabout. We have requested such enhancement in commenting on recent development proposals in and around Power Road. Some of the elements such as a pedestrian crossing of the North Circular could be delivered as part of TfL’s planned improvements following completion of the Power Road Bridge in 2018.

Routes B and C We believe priority should be given to Route C – based on the reopening of the historic gate into Gunnersbury Park. There may be security issues in providing multiple public entrances to this side of the park. Those responsible for the current major regeneration of the park need to be consulted.

Route D Agree with proposals.

Route E This would be a particularly complex and expensive route requiring a new bridge over the railway. Use of the section of the route through the Stadium development will be heavily constrained around matches. See comments under Character Area B below.

Public realm 5.14 – 5.20

We agree with the need for significant public realm improvements. Restoring a pedestrian human scale will be very challenging given both the dominance of the road structures and the density and scale of consented/proposed developments.

Character areas

Kew Bridge Station (A) Trees would be very welcome but the opportunities for planting in this area would appear to be very limited. There is scope for more and better soft landscaping of the public space within the Kew Bridge development.

Brentford Stadium (B) This section needs modifying to reflect recent decrease in capacity of stadium and other changes. With only one of the 12 residential blocks being under 35 metres, use of the term mid-rise is misleading. The “public” spaces around the stadium are multipurpose; that between Blocks E and F will serve as shared pedestrian/vehicle space and gateway to the stadium. Public use of these spaces will be subject to restrictions imposed by crowd control measures on match days, that is on many Saturdays or Sundays throughout the season. See comments on Public realm under 4.1 Urban design principles above. The introduction of a sizable residential community into the area will place a further strain on the inadequate infrastructure

Two Squares (C) 5.28 We agree that there should be a pedestrian/cycle linkage between Capital Interchange Way and the land north of the Chiswick Roundabout (Route A). However, we consider that the visual severance of the overhead section of the M4 is such that the two should be defined as separate Character Areas; we suggest Brentford Fountain and Gunnersbury Peninsula.

Brentford Fountain Area The character of this area should derive from an attractive new leisure centre and associated public open space (Fountain Square). What is needed in this area is modest development that seeks to mitigate the harm inflicted by the stadium scheme, that fully respects the sensitive, low-rise surroundings and heritage (especially the townscape of the Wellesley Road CA) and seeks to mediate between these two very different townscapes. See comments under 3 Study Area above. Account should be taken of the development under construction at the Wheatstone House site; stepped blocks with a maximum height of 29 metres.

Gunnersbury Peninsula Area The character of this area should be focused on bringing the qualities of the MOL to the north into Brentford East and linking these green spaces to that of the Chiswick Roundabout. The isolation and constraints of the “peninsula” are such that the vacant triangular site at the Chiswick Roundabout and that currently occupied by B & Q (sites KI and KJ, Figure 5.1 of Capacity Study) should be considered holistically as one site. Otherwise, the ability to deliver a Gateway Landmark at the southern tip without compromising the potential of the B & Q land immediately north to provide high quality public space and buildings will be severely restricted.

[Note: we already have two Gunnersbury Triangles – the nature reserve east of Chiswick Business Park and the sports and social club near Acton Town station.]

5.29 – 5.31 and 5.33 We broadly agree with these approaches for both areas.

5.32 We request that this paragraph is deleted or amended to clarify that there is no potential for taller buildings other than the Eastern Gateway Landmark at the roundabout and possibly a Corridor Landmark at the inside corner of the M4 at Capital Interchange Way. See our detailed comments under Section 4 Building Heights. With a Gateway Landmark at the roundabout and a stadium with dense clusters of residential blocks around it, Brentford East will need no further demarcation. We sincerely hope that these developments will still permit us occasional glimpses of the elegant campanile of the “Steam Museum” – a favourite and truly “iconic” existing landmark.

Great West Road (D) 5.34- 5.36 We agree broadly with these approaches. Enhancement of the pedestrian/cyclist environment would be very welcome. Great care would be needed with respect to lighting/visual enhancement to the underside of the elevated M4. The underside of a massive, aging concrete structure is not a thing of beauty to which attention should be drawn. What type of activities would be considered appropriate for such spaces?

Lionel Road Station Quarter (E) 5.37 We agree broadly with this approach but question whether internal connections to Gunnersbury Cemetery would be advisable or acceptable to the owners of the cemetery.

5.38 We request that the second part of this paragraph is deleted or amended to clarify that there is no potential for taller buildings other than possibly a Corridor Landmark adjacent to the proposed Lionel Road Station. See our comments above under 5.32 and our detailed comments under Section 4 Building Heights.

5.39 With respect to new residential development overlooking Gunnersbury Park, see comments under 4.29 and 5.4 above.

Power Road (F) 5.41 – 5.45 We agree strongly with these approaches. We would suggest adding reference to Chiswick Studios after Power Road Studios in 5.41.

6. Planning Requirements 6.1.- 6.13 We agree broadly with these paragraphs, except

under 6.3 – assuming it applies to *residential* development – amend to make reference to type of housing and to SC3.

6.5 This should be extended to sites bordering other noisy and polluted roads such as North and South Circulars.

6.6 We do not agree that providing residential on upper floors is adequate response to air and noise pollution; see comments under 3.8 and 3.9 above.

7. Delivery and Monitoring 7.1 – 7.19 and Appendix 1

We consider it necessary to remedy the existing transport, deficiencies *before* any further growth is considered
See our General comments on page 1.

We strongly endorse the need for a co-ordinated approach for the reasons given but question how the Council can bring this about. Evidence from recent applications in the study area demonstrates a lack of willingness on the part of developers to adopt a holistic approach [sites in both parts of Character Area C].

How will the necessary “school places, transport facilities and health facilities” for Brentford East be delivered by infrastructure providers (Appendix 1) if no sites for these have been identified within the study area?

With respect to the projects listed in Appendix 1, the following comments submitted in February 2016 on the GWC Local Plan Review: Issues document are still relevant.

The real problem with respect to transport improvements on which the entire strategy for the GWC depends is that the Council is unable to give any assurance of delivery as it is dependent on other bodies. The projects in the ICD, like the statements in the Local Plan policies EC1 and 2 are long-term aspirations/wish lists rather than firm policies. Only two improvements in Table EC1.1 are “planned”. One is the Piccadilly Line upgrade for which the start date is to be confirmed (anticipated early 2020s). The other is the current District Line upgrade; although in principle an improvement, the increased train capacity may well exacerbate the station capacity problems at Gunnersbury (see below).

The Council can only support and promote, not deliver. We recognise that delivery is often very complex with many stakeholders involved but the Council’s track-record on supporting/promoting is poor. Its approach is one of approving development and then failing to follow through on the associated transport improvements identified as necessary.

The continuing absence of the footbridge between the Chiswick Business Park and Bollo Lane and the time taken to extend bus services to the business park provide stark evidence of the Council’s inability to deliver essential infrastructure in a timely manner. The need for the footbridge was recognised as early as 2001 and planning permissions have been granted in 2007, 2012 and 2015. [Note: Work commenced in August 2017 but completion is not expected until late 2018]