

**Re: Citroen Site, Capital Interchange Way, in the London Borough of Hounslow**

**Planning Application: Ref No: 01508/A/P6 & P2017/4692**

**STATEMENT OF NIGEL MOORE AS OBJECTOR TO THE APPLICATION,  
REPRESENTING THE BRENTFORD COMMUNITY COUNCIL.**

Brentford Community Council (BCC) is an independent organisation established in 1989 with start-up support from Hounslow Borough Council. Since 1999 we have been financially independent, funded by donations from organisations and individuals across the community.

Our mission is to represent the general interests of the area with any person or agency providing services or undertaking activities affecting the local environment and well-being of people living in the area, **specifically related to local planning applications and planning issues**. We are non-party political. The group is open to anyone who would like to get actively involved in the BCC or would like to bring an issue to our attention.

The BCC has been heavily involved in considering the proposed Application, in close communication with the London Borough of Hounslow, writing to them on January 10th, 2018 with the BCC analysis.

The letter of January 10 contained the following comments:

**1. Summary and Recommendations.**

The application does not conform with the strategic planning principles in the Brentford East Draft SPD, which the Council has recently adopted for consultation, nor does it make provision for the necessary infra-structure. If this scheme is approved the draft SPD proposals would be jettisoned before they were formally adopted. (see paras 4, 5 and 6 below)

This development, if approved now would further aggravate congestion in Brentford East. Development in all sections of the Great West Corridor depend on “game changing” improvements to the public transport system being operational before new developments are approved. (See para 14 below)

The proposal is too high, too dense, out of character with the surrounding Conservation Areas and Character areas and would be a severe visual intrusion into many valued views. (see paras 8 and 9 below).

The application has been submitted before the issues raised in the London Plan Review, the Cycle Superhighway9 and the Transport Assessment built into the Great West Corridor Consultation/Local Plan Review have led to appropriate development plans. As a result it has to be assessed against the present Local Plan (2015).

The application is clearly an unacceptable departure and should be refused.

**2. Consultations.**

We note that the Design and Access Statement gives a misleading impression of the effectiveness of the applicant’s approach to consultation.

We wrote to Shane Baker earlier to report the failure of the consultation meeting held with Mr Ed Tibbetts of L&Q and he indicated that this would be noted in the section of your report on consultations.

Mr Tibbetts did advise us that plans would be made available to us when the application was submitted.

After the plans were deposited we wrote to Mr Maunder, who is now responsible for the project, inviting him to present his now complete scheme to the BCC in January 2018. He declined.

We then wrote to him again explaining that every major scheme in Brentford has been discussed face to face with developers. He has not replied.

#### DETAIL COMMENTS:

### **3. Implication for the Fountain Leisure Centre.**

We have been advised that the Fountains Leisure Centre will need to be re-built in 5/7 years. The Leisure Centre is a popular and well used attraction which is much valued by the community.

In our view any rebuilding should be on a site close to the present leisure centre at a focal point in the development of Brentford East, as set out in the Draft Brentford East SPD.

The proposal adopted by Cabinet to re-provide the Leisure Centre on the adjacent Citroen site, owned by L&Q, would have met this requirement.

However, L&Q have withdrawn from this arrangement and have now submitted a planning application for a housing development.

This leaves the future of the Fountains Leisure Centre unresolved.

We would ask that before the Council considers this application they should decide on the appropriate location for the future leisure centre.

The possible options include:

To demolish the centre and rebuild it on its present site:

To refuse consent for this application and acquire the Citroen site for a future Leisure Centre.

To follow the refusal for the proposed bus station on Capital Interchange Way and acquire that site for a future Leisure Centre.

To include a future Leisure Centre in the redevelopment brief for the B&Q site/Hudson Square

To close the centre permanently.

Option 1 would leave residents without an important facility for several years. Options 2 and Option 3 might require the council to use CPO powers. Option 4 would locate the centre north of the A4 with difficult access. We would expect Option 5 would be resisted by local residents.

In the context of the SPD proposals the new Leisure Centre should be at the centre of the new development.

All these proposals have severe financial implications.

#### **4. Infrastructure.**

The Brentford East Draft SPD envisages additional residential development on sites close to this one. Detail consent has already been granted for 600+ flats in the Brentford Community Stadium Complex. Additional flats were proposed in the application across Capital Interchange Way. Although this scheme has been refused further residential development is likely to be considered on this or alternative sites. The new population occupying the 2,000+ flat is likely to exceed 5,000.

But none of these schemes provide adequate infrastructure.

The BCC considers that the new population and existing residents require shops, creches, schools, gyms, doctors, police and other services which should be provided concurrently with housing development.

It may be appropriate to site a sub-centre to group these services together, close to the re-built Fountains Leisure Centre which is the major community facility now in the area.

In that event land would be required for infrastructure which is now included in the all-residential proposals for the Citroen site.

The BCC asks that as well as taking decisions on the re-building of the Fountain Leisure Centre, the Council allocates land for non-residential purposes on appropriate adjacent sites before determining this application.

#### **5. Future Development Plans for the site formerly proposed for a bus depot on Capital Interchange Way.**

We understand that the design for housing development on the Citroen site was related to the three residential towers which were proposed for development above the bus depot in Capital Interchange Way. D&AS para 5.2 shows how critical that relationship was.

This application has now been refused. but the decision may be subject to appeal.

It is likely to be some years before the final development of that site is determined and built. As a result it will not be possible to determine a secure planning brief for the Citroen site well related to this adjacent development .

The BCC notes that there has not been the opportunity to design this scheme to accord with firm proposals for the west side of Capital Interchange Way.

#### **6. Brentford East Draft SPD.**

The council has just completed its consultation on The Draft Brentford East SPD, dated October 2017. (BESPD). The BCC submitted their views (BCC826) in December 2017. The BCC welcomed the Council's initiative in producing an Urban Design Study which sought to establish design principles to co-ordinate new development in Brentford East.

While the BCC suggested certain changes in the consultation text, they supported the approach adopted and look forward to the amendment and adoption of the document as a design guide. In order to give greater weight to the document the BCC proposed that the Draft should be submitted to the public inquiry into the proposed revisions to the Local Plan.

Sections 5.1/2/3 of the Design and Access Statement (D&AS) describe the analysis used to orientate the 6 blocks proposed on this site. The diagrams illustrate their relationship to the towers around the Brentford Community Stadium, which have full planning consent.

Unfortunately, the blocks in the Stadium complex were located on the disparate patches of land around the stadium within and close to the triangle defined by the rail tracks. This has led to an irregular pattern of towers which does not follow the grain and pattern common in Brentford.

As a result, the designers of this scheme have had to relate their buildings to an irregular group of towers. Their response has been to group the six towers on this site in a fan shape to give their residents the best orientation they can.

Paras 5.28/5.33 and fig 5.8 of the Draft Brentford East SPD (BESPD) set out the Urban Design principles which should be followed in developing this and adjacent sites.

This section of the BESPD refers back to “strategic principles” set out in paras 4.01/50.

**Principle 3** (Tall building Thresholds) states that the maximum height of (other) tall buildings should be 16 residential storeys

**Principle 4** (para 4.45 BESPD) suggests that a “landmark” could be acceptable on the north west side of Capital Interchange Way” adjacent to the A4/M4 corridor. This is the site of the proposed bus depot and flats rising to 20 storeys, for which planning permission has just been refused.

While the BCC have objected (see BCC826) to the proliferation of landmark buildings in Brentford East, their inclusion in the Draft SPD underlines the inappropriateness of proposing high rise flats on this site adjacent to the possible site for a landmark structure.

**Principle 5.** Hierarchy and Layering (BESPD para 4.48) states “that the tallest building should front onto the Great West Road. The building fronting onto the Great West Road at this position is the recently built Volkswagen showrooms at about 6/7 commercial storeys. The para then goes on to state “the height of taller buildings should then drop away from the Great West Road....” to build up to a visually coherent development massing.

**Principle 6.** Legible townscape (BESPD para 4.49) states “tall buildings should generally only be promoted in places where it can be demonstrated that they help to enhance the legibility of their surroundings, assist in place making.....”

**Principle 7** Integrate with surroundings. (BESPD para 4.50) “They (tall buildings) should be exception rather than the norm”

Clearly the design concept of this application does not contribute to the integrated Urban Design approach envisaged in the Draft Brentford East SPD.

We would also like to request that the proposal made in para 8 of our letter on the Brentford East Draft SPD (BCC826) should be tried out for this application.

The BCC asked that a 3D computerised model of the SPD proposals could be prepared so that individual applications could be seen by the Planning committee in the context of the area.

## 7. Urban Response

Section 5 of the D&AS sets out diagrams showing how the layout of the six blocks are arranged. It does not show why this form is considered to be appropriate. nor how these tall blocks would fit in with those on the adjacent sites.

It is also does not show how this development would fit in with the proposals in the BESP, nor the 7 strategic principles in that document. In fact the design works against ALL the principles set out in the BESP

As this application is likely to be the first scheme to put to the planning committee since the BESP was published it could, if granted planning consent, jettison the whole concept of the draft SPD plan before it was even presented for adoption.

## **8. Height and Distribution Strategy and Views.**

Para 5.2 of the D&AS considers the height distribution strategy and para 5.3 refers to views.

It should be noted that no justification for the proposed density is included in this section. With a site area of 0.94 hectares the proposed density works out at 445 units/ha or 1,168 ha (habitable rooms) /ha. Even if the site could be defined as Urban in this outer London borough the proposed density would be 1.66 times that recommended in the London Plan.

The fan shape adopted (see D&AS para 5.2) would open up the flats to the back of the Fountains Centre site. If this site is to be developed in accordance with the BESP. It should result in a continuous ribbon of development along the north Circular road frontage, cutting out sunlight, daylight and open views while providing a barrier against pollution.

It is noted that the draft for the London Plan Review published in November 2017 does propose that the whole of Great West Corridor should be designated as an Opportunity Area, However, this proposal has not been tested and it is possible that the Transport Assessment to be carried out in 2018 will demonstrate that the “game-changing” transport improvements being considered will not be operational within the plan period and that the capacity of the area will not be sufficient to meet the criteria for a London Plan Opportunity Area.

In any event this application has been submitted in the context of the Hounslow Local Plan 2015 and a development at this density would be a major departure. A scheme which complied with the London Plan guidelines would provide 268 units or 703 habitable rooms which would not result in such a dominant mass.

The proposal to locate the highest building on the north east corner of the site would place it next to the location for a “landmark building” shown in para 4.45 of the BESP, which is referred to in our text (above). The drawings show the extreme contrast between the mass and scale of this group of buildings with the low rise terrace housing nearby.

Para 5.4 (D&AS) shows the collective effect of the scheme. The fan of high blocks is so overpowering that it is totally unacceptable in this context. The height of the proposed buildings would be a severe visual intrusion into views 1,4,5,6,7,8,9,10,11,12,13,14,15 and 16 of the sixteen views submitted in the supporting documentation to the application.

It is also noted that contrary to London Plan housing guidelines about 50% of the proposed units are single aspect flats.

## **9. Character Areas and Conservation Areas.**

The applicant’s Townscape Visual and Built Heritage Assessment (TVBHA) Fig 4.2 shows that the site is surrounded by Conservation Areas; and by Registered parks and gardens (fig 4.3); and is close to a World Heritage site (fig 4.4); and is surrounded with Townscape Character Areas.

Typically these are low rise terraces, which would be significantly harmed by this concentrated mass of high rise development.

## **10. Affordable Housing.**

Section 3 of the D&AS describes the warm welcome given to this scheme at the pre-application stage by Brentford residents, who cannot afford to purchase or rent a home of their own.

Brentford is deficient in affordable housing, largely because recent housing schemes have been linked to major projects like the Brentford Community Stadium to “enable” those underfunded developments to proceed.

The BCC welcomes the 39% of affordable housing provided.

## **11. Family Accommodation.**

Section 9 of the D&AS sets out the accommodation to be provided. It is noted that only 5.1 % of all the units would have 3 bedrooms and therefore would qualify as family accommodation as defined in the London Plan. No unit has more than 3 bedrooms.

It is also noted that there is an absence of 4 person 3 bedroom units. It has been noted in other recent schemes in Brentford that this type of units is often not provided. However, it is a type which is very suitable for many families who find they cannot provide separate bedrooms for their two children when they reach puberty. As a result, these families try to move away. The provision of 3 bedroom 4 person units would make these schemes more sustainable.

There is a recognised chronic shortage of family accommodation in Brentford which is so severe that, even in places like this site, which are not preferred locations for family homes, it may be necessary to include more large units in the mix to meet the need.

## **12. Safety and Means of Escape**

The recent disaster at Grenfell Towers reminds us of the need for internal alternative means of escape. Para 6.3 (D&AS) shows that all the flats have been designed with single cores offering no alternative means of escape which is unacceptable in the emerging Health and Safety requirements of housing in London.

The plans should be re-drawn to confirm with current best practice.

## **13. Amenity, Landscape and Air Quality**

The first floor plan shows a roof garden. This space is intended to provide the sole access to some of the flats, access to cycle storage and the main communal amenity space for about 1100 residents.

Much of the area will be in shadow for many months in the year and all of it will be exposed to the prevailing west wind and to any internal turbulence created by the surrounding high rise blocks.

In general, it is noted that there are various aspects in the scheme where there are unacceptable or hazardous effects. The expert report attached to the application suggests that further mitigation is required to deal with those affecting some thoroughfares and building entrances. While physical screens can be installed or further trees planted, this expert commentary indicates that the scheme is too dense, the buildings are too tall and too close together so that, if built as proposed, they would create various wind tunnels that would produce very difficult ground conditions.

In addition, the space will be in a highly polluted area.

The amenity area is inadequate and provides little more than a designed parterre to be viewed from the flats above.

It is noted that as there are, as yet, no proposals for the redevelopment of the adjacent Fountain Leisure Centre site it is not clear whether that site will be developed in accordance with the Draft Brentford East SPD.

The SPD proposes that the Fountains site, which is next to the North Circular Road, should be built as a continuous terrace to screen the Citroen site from the pollution generated from this heavily trafficked road. This would also block the open views and the daylight and sunlight recoded in the application papers for this scheme.

We note that a very large proportion of the site is shown as hard landscaping, which para 7.11 (D&AS) describes as “designed to be austere”. The computer generated images show that this is part of the playground area as well as providing car parking spaces, areas for servicing vehicles and for visitors parking.

We consider that the open spaces are inadequate for each of multiple uses proposed.

#### **14. Traffic Generation.**

The Great West Corridor Preferred Option Consultation Document 2017 sets out the development potential of the corridor area on the assumption that “game-changing” proposals to improve access to development sites can be achieved.

The BCC has responded to this consultation. The consultation document also states that in 2018 a Transport Assessment will be carried out to see if the Local Plan Review should propose more limited development based on more modest traffic improvements.

In our response (BCC820) we noted that traffic pressures were already unacceptable, particularly in Brentford East, and that they were likely to get worse. Among the factors were:

The build out of the Stadium and approved housing development.

The reduction of road space to provide for Superhighway 9.

The expansion of Heathrow and/or development to the west of London.

As a result, we concluded, in response to the Draft Brentford East SPD (BCC826) that:

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

- and that there was no further capacity for development in Brentford East until accessibility had been improved and actual PTaLs had risen.

#### **14. Servicing Cycle and Car Parking.**

Paras 7.1 and 7.916 (D&AS) illustrate the proposals for servicing the site. As there are few shops close by we consider that far more space will be required for deliveries.

We are concerned about easy access to the first floor for families with young children, cycles stored at that level and for disabled or elderly residents.

The BCC considers that the detail proposals should be reviewed.”

Following a consultation on revised documents, and the calling in of the L&Q planning application, we wrote to the Mayor on June 25 2018 : -

“Last year you produced a draft New Plan for London, which was sent out for consultation. We expect that you will review the comments you receive and that an amended text will be submitted for a public inquiry before you decide whether you wish to adopt it.

The plan emphasises the importance of housebuilding, particularly for those with low incomes. You have also proposed that there should be a major heist to the annual house-building targets in every borough.

The draft London Plan also considers the full range of problems which face our city, which include better transport, cleaner air and the protection of Urban Green spaces (MOL) and the Green Belt. The shortage of developable land may make some of his objectives difficult to meet.

The BCC fully endorses your concern for new affordable housing, as there are many people who need family housing in our borough that they cannot afford.

The position in Hounslow is particularly unfortunate as the Council have recently approved two schemes which the applicants demonstrated were not viable unless they could be supported by additional funds. The proposal was to permit high density housing, all at full market costs, which would generate funds to “enable” these projects to be built.

The locally popular Brentford Community Stadium required a high-rise hotel and 910 multi-storey flats to generate funds to allow this unviable project to go ahead.

This precedent has been followed by a recent approval of plans to build 300 flats on Half Acre and next to Watermans Park on the river to enable our Arts Centre to be re-located and re-financed, again with few flats available below full market rents.

The problems in Brentford East are particularly severe. Any development there would have to be built around the busy North and South Circular roads connected by the often grid-locked Kew Bridge and by the important A4 and M4 roads, leading to Heathrow and the west. Planning attractive buildings and safe spaces may not be possible. Air Quality is also a problem as it is one of the most polluted areas in West London.

But the Council has now prepared a Draft Planning and Design Plan (SPD) for Brentford East, which does set out planning guidance to develop the area as a whole. This is a welcome move and we hope the Mayor will have the opportunity of considering whether the plans for the L&Q site, which is in Brentford East, not only helps him to meet his targets for

affordable housing but also meets the many other needs for our residents which are set out in his own plan and in those prepared by Hounslow.

In our view the Council should not have sought to fund unviable projects by allowing housing at excessive densities, especially when few, if any will be available to those with the greatest need and the minimum resources. Housing needs to be provided for families of all sizes. Plans should include schools and shops and amenities for a full life. Your own London plan sets out all these objectives and it is important that the dire need for affordable housing does not unbalance your plan.

We would ask you to support Hounslow's initiative in promoting the Brentford East SPD.

We note that the planning guidance in the SPD is not followed by this application as the proposed heights significantly exceed those guidelines .

We ask you not to approve this application and to wait for Hounslow Council to complete it's consultation on the draft SPD so it can refine and adopt the document.

When the SPD is in place it will include planning briefs for all the development sites in the Brentford East SPD area, including the Citroen site. These briefs should conform to the SPD guidelines AND require an acceptable level of affordable housing."

### **Summary :-**

If Hounslow Council is to be able to implement the coherent and area-embracing strategic planning policies that are demanded in the Mayor's draft London Plan, the refusal of this application by the local authority must be endorsed by the Mayor.

Nigel Moore

Brentford Community Council

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