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Mr Sunny Desai
Development Control

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By email

Dear Sunny,

**Outline Planning Application: Commerce Road, Brentford
Views adopted by the Brentford Community Council.**

The Planning Consultative Committee of the BCC has adopted views on this application after a series of meetings with the applicants and I would be grateful if you would include them in your report to the Sustainable Development Committee.

Yours sincerely

Denis Browne
Chairman, Planning Consultative Committee
BCC

Cc ISIS
and BCC website.

Commerce Road
Brentford Lock West
Pre-application Consultation
Response of the Brentford Community Council
February 2011

1. Bridge

The pedestrian and cycle bridge to the other side of the canal landing would be a critical element in making the development accessible. We welcome the principle of the link, which furthers the aims of the BAAP, but remain concerned about the detail of implementation and management when it is in service. The local residents of Robin Grove must be involved directly in these plans.

A shorter access route to Brentford Station would greatly improve the PTAL of the site. We encourage ISIS, TfL and Network Rail to make the west end of the station accessible. This should be part funded through Section 106 Transport contribution.

2. Transport

Even with the bridge, cars would still play the major transport role. We welcome the provision of additional bus stops along Commerce Road, the improved phasing of the lights at the Commerce Road junction, and the other proposed improvements to other junctions on the High Street / London Road.

However, without a north end link from Commerce Road onto the Great West Road, the Commerce Road junction remains the bottle neck of the whole scheme. Furthermore, the playing field south of the High Street would be the main recreation area for the site residents so safe un-supervised crossing for children at all hours would be essential.

If necessary, the total accommodation of the scheme should be limited to ensure it operates within capacity in the AM peak with the full green phase time available, while retaining the pedestrian phases. We request that unless this can be shown, the application be refused.

3. Height

Planning policy considers height and massing in relation to nearby buildings only. Relevant comparisons are the adjacent Character Areas not the recently permitted schemes on the Great West Road, which has (regrettably) become the informally approved area for tall buildings. The relevant Character Areas of the BAAP are; 23. Haverfield, 31. Robin Grove, 32. Brentford Lock, and 33. Commerce Road.

The height of the scheme is mostly 5 stories (i.e. this is the median of the heights of the blocks), and we accept this to be appropriate for full development of the area.

We still prefer the points at which these buildings are higher than those of The Island, to be further back from the water. We also recommend use of the London Canal Committee guidelines which were incorporated into the Council's UDP.

We object to the heights of the tallest elements at 8-10 storeys, which are incompatible with all but one of the buildings in the relevant Character Areas. The one exception is the tall part of Brentford Lock, which we strongly resisted at the time and which was then built to a height which exceeded its permission.

4. Sound

We welcome the location of commercial floor space at ground floor level of the Commerce Road frontage. However, the noise of buses stopping and starting would affect residential units at higher level on the frontage.

These should be set back and have appropriate acoustic glazing. The acoustic standard of the fabric and glazing of this frontage should be set by condition to be appropriate for the possible future acoustic environment, not the present environment.

5. Privacy, Daylight and Sunlight

We accept that narrow streets establish a human scale and encourage pedestrian, rather than vehicular traffic.

However narrow streets are historically common between buildings of two and three stories height. In some streets of this scheme the distances between facing buildings of four and five stories height, are only 14m instead of the 20m distance required by the UDP and generally regarded as the minimum acceptable.

We are not convinced that adequate privacy can be achieved by off-setting windows and the orientation of the buildings.

We are also concerned about the level of daylight in rooms, and sunlight in the public circulation areas.

We would welcome this approach if it were proved that these architectural challenges were met. However there is a distinct possibility that the only way to achieve satisfactory privacy and light would be to alter the basic layout or to reduce the heights of the buildings, which are the very matters germane to an outline application.

We therefore request that such detailing not be left as a reserved matter. Enough detail should be provided to prove the existence of solutions to these problems, or the application refused.

6. Density

We are not overly concerned about density as such but it is usually a good indicator that the future residents will have problems with privacy and sunlight, for example.

Please note that we object in principle to any suggestion that the permitted designs for the Great West Road are a precedent for density on this site.

7. Water Freight

We have objected to parts of British Waterways' Waterspace Strategy, and do not accept that the site provides no viable transshipment or wharf opportunities. We regret that the scheme gives up the future opportunity of water freight access at the northern end, and do not regard the vague possibility of a freight 'node' south of the High Street as a substitute.

At the very least, we suggest commitment to funding the dredging of the channel to allow the passage of loaded barges, via a section 106 contribution to support future waterborne freight at Brentford.

Matthew Rockel
Brentford Community Council