

Brentford

Community Council

Founded in 1989

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Kew Bridge Road (Scottish Widows Site)

Planning ref: 00657/P/P13 & 00657/P/CA1

Response of the Brentford Community Council To Planning Application by St Georges, West London Ltd

BCC Ref: Q18

July 2006

1. Planning Consultation

- 1.1. Public consultation on this prominent site was carried out by LBH in 2000, resulting in the Site Planning Brief of 2001. From the beginning, the outline proposals attracted much local opposition.
- 1.2. St George West London Ltd. submitted an earlier application, which was refused planning consent by Hounslow Council in 2004. This decision was upheld at appeal in 2006, at which the Brentford Community Council gave evidence as a Rule 6 Party. The applicant then dropped that scheme and replaced its architects.
- 1.3. Public meetings were then set up by John Thompson, the new architects of a replacement scheme for St Georges, to invite community input into the design process. Members of the BCC were active in these meetings and considered that although the consultation was extensive, there is less evidence that due attention was paid to the results.
- 1.4. Despite frequent requests for actual scaled drawings during the continuing pre-application meetings the architects only produced proper plans for their emerging scheme in September 2007, after the appellant had purchased the Wagon and Horses public house and enlarged the boundary of the application site.
- 1.5. Only at that stage (after the majority of the public consultation) did the material the architects were developing correspond with the current application. One further meeting was held in April 2008, although neither internal floor plans nor accommodation schedules were available then.
- 1.6. We note that our letter of September 2007 to the architects, giving the views then adopted by the BCC and endorsed by other local amenity societies, has not been replied to or referred to in their document on their consultations.

2. Status of the Application.

- 2.1. The current application unfortunately contains a number of errors, which are significant enough to affect a decision. These consist of two types.
- 2.2. The first is statements of subjective text, which could kindly be described as optimistic views, being presented as fact. An example of several is the statement that the site is "620 metres east of Brentford Town Centre", which is only true if one takes Waterman's Park as the Town Centre. This type of statement suggests that the application should be considered against criteria

that would apply on a town centre site. The site is in fact some 1.6km from the true centre of Brentford and sub-urban in nature.

2.3. The second is the omissions of normal detail on drawings, such as the omission of ridge and parapet heights above Ordinance Datum.

2.4. In our view the current application should be withdrawn, the errors in the application should be corrected and the application should be re-submitted. Alternatively a list of errata should be agreed with officers and attached to the application for inclusion with all copies for distribution and consultation.

3. Response to the Current Application.

3.1. The BCC notes that the present application has addressed some of the unacceptable features of the first application. In particular we are pleased to see that no building is now proposed on the flood plain, that the 'glass ziggurat' on the roof has been modified, and that the major access to the site is now from the adjacent property.

3.2. While these are all welcomed, we consider that the Local Planning Authority should not consider the changes made, but rather the acceptability of the scheme now submitted in the context of the London Plan (Further Alterations 2008), the BAAP, and the Inspector's Report.

3.3. The Brentford Community Council has met with the Kew Society, The West London River Group and the Strand on The Green Association to consider our response to this application. These residents groups have agreed that Hounslow Council should be requested to refuse the scheme. Each organisation will set out its individual reasons for this view.

3.4. In particular the Brentford Community Council considers that the major issues of concern are:

1. The inappropriate density and scale.
2. An Urban Design not worthy of this site.
3. The lack of family accommodation.
4. Inadequate recognition of the river.
5. Parking and service access.

4. Density and Scale

4.1. The buildings are concentrated on the north part of the site (for excellent reasons), which makes effective density, and bulk of those buildings greater than the whole site density would suggest. Despite this, the proposed density is in considerable excess of that recommended by the Inspector at the previous Appeal.

4.2. In his Decision Report, the Inspector was clear in his recommendations for an acceptable density on this site, which were that it should be in the lower quartile of the range suitable for a site in an Urban environment with PTAL of 3 and 4. For this site and using the current (Feb 2008) version tables of the London Plan, the hr/ha should be around 300hr/ha. (The "appropriate" figure is lower than at the time of the Inquiry because the latest LP has changed the range from 450-700 to 200-450 following the decision of the Mayor to remove consideration of the amount of on-site parking).

4.3. The proposed density of 659 hr/ha would only be acceptable with this PTAL in a Central London location. This site is clearly not a Central London location, and buildings on it must not be allowed to look as if it was.

5. Urban Design.

- 5.1. Unfortunately the BAAP does not include those elements of the original Site Brief that would have more explicitly guided the design. (The BCC made representations on this to the BAAP Enquiry).
- 5.2. We are reminded that the Inspector stated in his report (para 9.90 on page 81) "this is not just any part of London. Rather it is a highly prominent site, seen by many on foot, cycling, on buses and from the river as well as in cars as a highly sensitive site, emphasised by the area's myriad designations"
- 5.3. This site is on the major approach by road or foot to the World Heritage Site of Kew Gardens, forms a pivot between the Conservation Areas of Kew Green, Strand on the Green, and Kew Bridge, and dominates the outlooks of the Listed structures of the Stand pipe Tower, the other Steam Museum buildings, Kew Station and of course the bridge itself. In addition its location on the river and at the elbow in Kew Bridge Road ensure that it is the focal point of distant views from many directions.
- 5.4. The site therefore demands an approach that is sensitive to the scale of the local grain around it, and inspires the eye when the development is seen from a distance.
- 5.5. Unfortunately the proposed scheme, although using modelling to imitate the appearance of a group of buildings, still reads as a single mass and not as a group of buildings in keeping with the historic grain and scale of the area.
- 5.6. Despite the modelling, and the stepped profile, the building is essentially very massive. As a result it has an overbearing visual impact on the neighbouring buildings and public areas, and is harmful to the Kew Bridge Conservation Area and the setting of the adjacent Grade 1 and Grade 2 listed buildings. Above all it fails to lift the spirits in a way that the sight of a building on this site should.
- 5.7. The BCC has consistently asked that new development should not isolate the river from the High Street and that views through should be incorporated in new designs. It will be particularly hard for residents to accept their lost views on this site, which has been open for so long.
- 5.8. We consider that the design would be improved by:
 - *Reducing the height by one or two floors.*
 - *Removing elements that give a cluttered appearance, including the penthouse over the oval corner cafe block and the four-floor projection in front of the central tower on Kew Bridge Road.*
 - *Amending the riverside elevation.*
 - *Setting the west elevation further back from the Kew Bridge kerb line.*
 - *Allowing views through the building from the High Street to the river.*
 - *Omitting the all glazed penthouses*

And either;

 - *Amending the design of all elevations so that the elements read as a group of connected buildings with co-ordinated distant visual impact,*

or;

 - *Splitting the mass into two or more separate buildings each with its distinct architectural style and impact, and allowing a real gap between them.*

- 5.9. The reduced height and amended design we have proposed would equate with a more acceptable density.
- 5.10. We scale the drawings to show floor-to-floor heights below 2.9m. We ask that realistic heights are shown and that OD levels on all roofs are indicated.

6. Family Accommodation.

- 6.1. Due to previous planning policies and current market forces, most new building in Brentford over the decade has been of one and two bedroom flats. Brentford now risks an oversupply of smaller accommodation and this scheme is of itself too large a community to be allowed to consist mainly of single people and sharing couples. In particular Affordable Housing needs to be suitable for active children because of the difficulty such families usually face in relocating, as their babies grow up.
- 6.2. The Mayor's Housing SPG states (Para 11.3) that the London-wide net housing requirement is for 30% of dwellings to have four bedrooms or larger, and that need rises to 42% for social housing. The need for units with two or three bedrooms is 38%. While no one scheme has to provide exactly these ratios, this is a large site with few physical restrictions that can and should do more to house families.
- 6.3. In an area of open space deficiency, the key required to turn two and three bed flats into family units is of course adequate amenity space. This should ideally be private to each unit, but must at least, meet the minimum area standards and be explicitly suitable for children to play in.
- 6.4. We welcome the addition of the corner of space allocated as a "play area" for affordable housing, despite its unfavourable orientation, the split in level (half is over the car park) and its proximity to the access road. Unfortunately it is also not big enough. In assuming that roof terraces can make up the rest, the applicant has overlooked the necessity that children can actually play there. This would require the addition of edge guarding and restraints that would make a mockery of the aesthetic problems discussed elsewhere in this response.
- 6.5. On this site in an area of open space deficiency, *we look for a scheme where the majority of the units (both for sale and affordable) are suitable for families, are provided with private and public amenity space and have facilities for children's play.* Clearly this objective has not been achieved.
- 6.6. We are also conscious that too many new built units are beyond the means of many families. There is an urgent need for affordable housing. In this scheme only 26% of the flats are "affordable" and only 21.7% of the habitable rooms are "affordable". On a site with few physical problems and with high expected private values this is not acceptable.
- 6.7. *We recommend that a higher proportion of flats be allocated to affordable housing.*

7. Design Starting From the Water.

- 7.1. The scheme as a whole fails to conform to many of the Blue Ribbon Network principles of The London Plan 2008, particularly aspects of Chapter 4B (Designs on London), and the River-relevant parts of Chapter 4C.

- 7.2. The provision of a Boat House is one of the few explicit requirements of the original site brief to emerge in the BAAP, and we consider important that it be respected. The support of facilities for canoeing and small rowing boats in the two arches under Kew Bridge is welcome, but this is not the same as a boathouse that could house a club using racing eights, such as the old Horeseferry Rowing Club previously on the site.
- 7.3. The increase of the public open space of the piazza linked to the towpath is welcome. However the landscaping details are unsympathetic to riverside environment both visually and environmentally, being more suited to a town centre location.
- 7.4. The Design and Access statement describes the piazza as an area that floods, misunderstanding the designation of this area as flood plain. It is correctly kept clear of building, and the levels are designed to flood to ensure that in the event of an exceptional disaster, volumes of water would be absorbed to help prevent flooding elsewhere. However, this does not make it like the towpath, which really does get wet regularly. In contrast, even the lower end of the piazza can be expected to flood only once a decade and there is no need for the surface treatment to be designed to meet regular inundations.
- 7.5. The unfortunate result is unsympathetic hard surfacing without soil, grass or planting, that abandons the requirements of sustainable land drainage and misses the opportunity for a real increase in habitats for native species to the benefit of local wildlife and public enjoyment.
- 7.6. Similarly the proposed treatment of the towpath and the zone from the piazza to the foreshore fails to realise the possibility of real environmental enhancement. It does little to increase biodiversity, makes no provision for habitats for inter-tidal species in this natural waterside location, and does not continue the green corridor that is the riverbank to the West. *We recommend a new approach to the landscape treatment with an emphasis on informal appearance and support for wildlife habitats.*
- 7.7. Any increase in light pollution should be resisted along this part of the river, which particularly on the South bank is one of the few parts relatively free from effects. The extensively glazed upper floors of the proposed penthouses would dominate the views at night for a considerable distance both upstream and down, and add significantly to the general problem on light pollution in the skies over West London. In addition the heat loss from such areas of glass is unlikely to be sustainable in any assessment against the Code for Sustainable Homes. *We therefore recommend that the glazed structures above parapet level be greatly reduced in size, or more conventional windows be used.*

8. Access/Parking/Servicing for Residents, Traders and Visitors + CPZ

- 8.1. We note that parking for residents is to current standards. However there are few roads near the site where on-street parking is possible and existing residents require all of this. We think that it is likely that existing residents will find their parking will be under threat.
- 8.2. *We ask that residents are consulted about a CPZ before any planning consents are granted and that any agreed scheme is fully funded by S 106 monies.*
- 8.3. The "scheme details" show 1,657m² of non- residential space, which is additional to the existing commercially used arches under Kew Bridge. This area includes the relocated public house, which is not on a frontage where on street parking is possible.

- 8.4. There appears to be no parking for those working in, servicing or visiting these spaces or for those visiting residents. In addition no parking is shown for vehicles and trailers using the pontoon.
- 8.5. *We request that proper allocation for non-residential parking on site is included.*
- 8.6. We note that TfL require that every flat should have at least one cycle stand on site. Considerable improvements to cycle routes around the site will be required so that these cycles can be safely used and parked. A significant part of the cost should be covered by S 106 payments.
- 8.7. We regret that earlier proposals to improve the setting and design of the Kew Bridge Road junction have not been included in this scheme. *We request that S106 monies are required to improve the junction and remove the clutter.*
- 8.8. We consider that the proposed forecourt to Kew Bridge Road should be as free as possible from parked vehicles. *We look for undertakings to limit stopping times.*
- 8.9. We consider that the Commercial frontage should be limited to B1 use (offices) unless these units can be serviced from the parking basement below.

9. Summary and Recommendations.

- 9.1. We believe that this scheme fails to meet the criteria of the current London Plan and the reasons for refusal by the First Secretary of State, and fails to meet the current needs of Brentford.
- 9.2. We request the Council to refuse this application because:
- It is an unacceptable design for the most conspicuous site in Brentford
 - It does not enhance the Kew Bridge Conservation Area or the setting of the adjacent listed buildings.
 - The building is too high, too massive and too monumental.
 - It does not allow views of the river through the site.
 - It does not provide adequate family accommodation (either for sale or as affordable housing) nor the amenity space required for families.
 - The proportion of affordable habitable rooms is inadequate.
 - It is an unacceptable design for a river-side site.
 - It will create parking problems for existing residents
 - The proposed forecourt is likely to be cluttered by service vehicles.
 - The proposed landscape treatment is bleak and does not allow for controlled run off of heavy rain.
- 9.3. We consider that many of these problems could be addressed in a redesign and we urge the Council to invite the appellant to take the opportunity to revise the scheme.