



Brentford High Street Steering Group

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Planning Policy Team
Civic Centre
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By email

29 April 2014

Dear Sir/ Madam,

Response to the Local Plan – Brentford Town Centre Focus

In 2007 Brentford High Street Steering Group (BHSSG), with the input of hundreds of local residents and community organisations including Brentford Chamber of Commerce and Brentford Community Council, produced the Community Vision for Brentford High Street supported by funding from Hounslow Council and expertise from the New Economics Foundation (see <http://tinyurl.com/brentfordvision>) - a precursor to neighborhood plans.

The recommendations were broadly reflected in the Brentford Area Action Plan (2009 - http://www.hounslow.gov.uk/brentford_area_action_plan/)ⁱ and built upon in 2010 by a short study jointly commissioned by town centre developers Ballymore and BHSSG from the Prince's Foundation for the Built Environment (see <http://tinyurl.com/princesfoundationreport>).

BHSSG are pro-development and the regeneration of Brentford Town Centre. The scheme built must have a clear USP with an architectural approach to both retail and housing that is connected to our town's historic roots; and a density that does not create unsustainable pressure on our school and healthcare infrastructure. We are concerned that the draft local plan does not reflect these community goals and that there is no sound reason why town centre-related elements of the Brentford Area Action Plan (local planning policy) are not being retained.

Site Allocation 17 – Brentford Waterside (pg 250)

Details of why we consider the Local Plan is unsound:

The current text of the Development Site Policies of the BAAP has been omitted from the local plan. The development of BAAP policies was extensively consulted on at great expense to the local authority and passed the examination in public. The resulting text for "Proposed use" provides inadequate guidance to the development of such a major and important site.

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The modification we consider necessary to make the Local Plan sound:

Under “Proposed Use” on pg 250 of the draft plan a reference to a new addendum that retains all the town centre–related BAAP text below is required:

BAAP, pg. 25-26

Brentford Town Centre

6.8 The delivery of a revitalised town centre is essential if the plan is to make provision for the needs of its growing community. The plan seeks up to 9,250m² of additional retail floorspace and 3,000m² of leisure uses within a consolidated town centre boundary that focuses new development on the existing High Street to create a strong retail core. The enhanced retail offer together with some supporting leisure, business and residential uses will increase the attraction of the centre for surrounding residents by improving access to a range of services and reducing the need to travel. New development within the town centre will also deliver a number of community benefits including a new area of public open space at the rear of St Lawrence Church, the provision of a new youth facility on the High Street and a permanent site for a local farmers market.

6.9 Regeneration within the town centre should also maximise the benefits of its historic assets and waterside location. Links between the High Street and the waterside will be provided to reconnect the centre with its waterways leading to new areas of public space along the banks of the canal and River Brent. The Centre’s built heritage including the character and setting of The Butts and Boston Manor and Grand Union Canal Conservation Areas, listed buildings and buildings of local townscape value will be protected and enhanced through redevelopment including the restoration of St Lawrence Church to secure its removal from the Register of Listed Buildings at Risk. The remnants of the town’s historic role as the gateway to the inland canal network from the River Thames illustrated through water-related industries and facilities such as boatyards, moorings and slipways are also protected as locally distinctive symbols of the working waterways

6.10 An assessment of transport capacity on Brentford High Street showed that significant increases in traffic are likely to be unacceptable with a number of junctions at capacity and experiencing significant congestion. In accordance with the recommendations in the transport assessment the scale of retail development envisaged is limited to be compatible with a local catchment appropriate to the Brentford’s District centre status. All new developments within the town centre will contribute to improvements to sustainable access including increasing the frequency of the E8 bus service, improving cycle and pedestrian links, and promoting demand management measures such as car free development on major town centre regeneration sites.

BAAP, pg 27

Enhancing Local Character

6.15 The underlying development principle of the Brentford Area Action Plan is to preserve and enhance all the features that make Brentford distinctive and to continue to provide the community with its sense of place and history. There are a number of historic buildings and features along the Great West Road and within the town centre that continue to tell the story of Brentford’s urban development that should be retained and enhanced for future generations. In

particular, the community place significant value on the historic contribution of the working waterways to Brentford's overall character and the Plan seeks the retention of these remaining links. Looking to the future, Brentford's character will continue to develop leading the way for rest of the Borough on issues of sustainable design and construction.

BAAP, pg.28

Objective 1

To promote the sustainable development and regeneration of Brentford.

- Delivering new development that supports the successful integration of new residents by meeting the social needs of Brentford's growing and mixed communities. Specific attention will be given to the need for affordable and family housing in all developments that provide residential accommodation.
- Supporting the sustained economic success and strategic economic role of the Great West Road where this can be achieved in a sustainable manner.
- Encouraging early community engagement as part of all major development proposals enabling people to contribute and participate effectively and influence the future of the area.
- Promoting sustainable modes of transport to discourage non-essential use of the private car.

Objective 2

To promote the re-use and redevelopment of previously developed sites and existing buildings within Brentford.

- The redevelopment of sites designated on the proposals map to provide for uses that will contribute to sustainable regeneration and controlled growth.
- The re-use of existing buildings which add to the character and local distinctiveness of Brentford, particularly within the town centre and waterside areas.

Objective 3

To provide a range of community, education, health, cultural, sport and entertainment facilities that will support Brentford's growing community, particularly young and old people.

- Providing community and social facilities and services that respond to the needs of a growing community.
- Intensifying the use of existing assets to provide for a range of uses that respond to the needs of a diverse population, new provision or relocation will be considered as needs increase and opportunities arise.
- Ensuring additional educational provision at primary and secondary level, requiring phasing if necessary.
- Providing additional health services and facilities needed to cater for a growing population.
- Providing for an increase in the scale and range of uses (social, community and entertainment facilities) within the town centre as part of 'Brentford Waterside' development.
- Ensuring adequate utility infrastructure to support new development.
- Supporting Brentford football club's plan to develop a community stadium hub linking a range of sports, health, education, leisure and business support facilities within the 'Brentford Diamond' (see Glossary).

Objective 4

To ensure that the design of new developments will protect and enhance Brentford's local distinctiveness.

- Ensuring high quality design in all developments in order to deliver a better environment, improve civic pride and community safety for everyone.
- Requiring new designs to capitalise on the area's historic, cultural and natural assets.
- Protecting and enhancing high quality and locally important buildings and structures.
- Ensuring that the design of any new development adjoining Brentford's waterways starts from the waterspace.
- Taking into account the impact of new developments on views from Kew World Heritage site.

Objective 5

To support Brentford's distinctive role for the provision of waterside industries and support facilities, and reconnect the area with its unique waterside location including the river and canal banks and foreshore.

- Protecting and enhancing Brentford's boatyards, together with its riverside and canalside buildings of distinction in a manner that contributes to the overall regeneration and character of the area.
- Encouraging greater use of Brentford's waterways for transport, freight, recreation and leisure by enhancing or restoring existing facilities, and providing additional facilities where appropriate, within all waterside development sites.
- Increasing public access for all sections of the community to, from and along the waterways within all waterside development sites. Specific attention will be given to delivering a continuous path along the Thames, where this does not interfere with boatyard operations; and providing attractive, convenient and accessible links between the canal and the river.
- Moorings, specifically off-line moorings, will be promoted and supported within waterside development sites. Support for further on-line moorings will only be considered where appropriate, in locations that will not impede navigation and/or visitor moorings.

Objective 6

To regenerate Brentford town centre as a vibrant District centre that celebrates the town's heritage and waterside location.

- 'Brentford Waterside' will be the key site to provide for a mix of town centre uses including retail, social and community uses. This scale and nature of uses should be sufficient to serve the community well whilst recognising its role as a district centre within London's retail hierarchy.
- The net increase in retail floorspace is anticipated to be between 5,000 - 6,000m² offering a range of local convenience and comparison facilities.
- An appropriate level of residential and commercial development should also be provided in order to deliver a viable town centre scheme.
- New development should be designed to protect and enhance local character, making the most of natural, historic and specialised local economic assets, specifically with regards to its location at the confluence of the River Thames and the Grand Union Canal.
- Clear and attractive gateways should mark the entrance to the town centre and integrate well with access points to and through the centre.
- Ensure that all new development contributes to the coherence and function of the town centre as a whole by consolidating the primary shopping area and the High

Street frontage.

Objective 7

To ensure that all new developments within Brentford contributes to the Community Plan goal of a ‘carbon-neutral’ borough and address key environmental issues that exist within the area.

- Sustaining biodiversity throughout and beyond the borough boundaries and avoiding and/or mitigating any adverse impacts produced by new development in Brentford through the protection and improvement of nature conservation areas and enhancements to local open spaces. Development that is not in compliance with the requirements of the Conservation (Natural Habitats, &c) Regulations 1994 is not considered to comply with the environmental objectives of the Plan.
- Ensuring new developments are resilient to existing aircraft, road traffic and industrial noise, air, light and water pollution and contribute to reduction where feasible through sustainable design and construction.
- Directing new development to areas with a low risk of flooding. Where developments are allowed exceptionally in high flood risk areas, flood management measures should reduce areas at risk of flooding.
- Reducing surface run-off by requiring Sustainable Urban Drainage Systems in all new developments.
- Minimising CO₂ and carbon emissions from major developments.
- All major developments contributing to the promotion of sustainable movement throughout the area, supporting healthier lifestyles and discouraging the non essential use of the private car.

BAAP, pg.34-35

Policy BAAP1 Sustainable Development

“Major regeneration schemes should achieve the highest possible level of the Code, including provision of ‘zero carbon’ homes (Level 6)...”

“Developers of all major developments should engage community and neighbourhood based organisations at the earliest possible stages in decisions about the future in order to deliver developments that take account of the wishes of the community, based upon local economic, social, physical and environmental needs and in so doing, strengthen community cohesion and facilitate social inclusion.”

BAAP, pg.36

Planning obligations

- “...Provision of a youth service facility within Brentford town centre
- Provision of cultural, social and community facilities to assist in promoting community cohesion and social inclusion. Consideration should be given to the relocation of Brentford library, a cultural and arts centre within the town centre, low cost offices, meeting and work space to cater for local voluntary and community groups as well as accommodation for local artists and a Safer Neighbourhoods office

BAAP, pg. 41-42

Policy BAAP2 Urban Design

High quality redevelopment of all proposal sites will be required in order to enrich existing areas of distinctive local character, rejuvenate those areas that lack a positive identity, and improve the overall quality of Brentford’s urban

form.

When considering new development proposals, the Council will, where appropriate, take into account the following criteria:

I. Through the Development Sites Policies, the regeneration of Brentford town centre, and enhancement of the Great West Road, the Council will seek to create high quality public spaces. Key areas identified for improvements are the Great West Road, Brentford High Street, Kew Bridge and waterside areas. The environmental and landscape improvements identified in the Development Site Policies should be reflected in development proposals.

II. All development proposals are required to demonstrate how the design complements existing areas of high quality and/or how they have realised the opportunities available for improving the character and quality of their local context. Brentford's character areas (see Appendix 2) set out the local urban design context to assist future developments in creating or reinforcing local distinctiveness, and the Development Site Policies interpret local character at a site-specific level.

III. The Council will seek the following enhancements to Brentford's built heritage:

- Development proposals should preserve or enhance the character and setting of the Butts, St Paul's, Boston Manor and Grand Union Canal, and Kew Bridge Conservation Areas as well as Kew World Heritage Site

- Seek to retain and enhance buildings that make a positive contribution to the townscape, including listed buildings and buildings of local townscape character

- Secure the beneficial re-use and sensitive adaptation of Listed Buildings at Risk within the Plan area including the Church of St Lawrence and Kew Bridge Railway station and any other local buildings subsequently included by English Heritage in the Buildings at Risk register

- Where appropriate, retain and restore historically significant features within the town centre including but not limited to plot widths, building lines, pedestrian links, open spaces and architectural styles.

IV. Design along Brentford's waterways, including the River Thames and the Grand Union Canal/River Brent, should start from the water space and make a positive contribution to Brentford's unique location at the confluence of these waterways. The contribution of boat yards, wharves and other waterway heritage features to the architectural quality and appearance of the area should be preserved and enhanced where appropriate

BAAP, pg 44

Justification

8.6 The physical qualities of Brentford's historic assets enrich the townscape giving it its distinct character and creating a sense of place. Historic assets include any component of Brentford's heritage from historic buildings to archaeological

remains. Many of Brentford's historic buildings and artefacts and their townscape contribution, have already been lost through redevelopment over many years. This increases the imperative to conserve what remains and encourage new developments which enhance these historic assets through complementary yet innovative designs.

8.7 The unique character of the waterside environment comes from the remaining water-related activities and buildings. The design qualities of these water-related features are mixed, but they continue to represent the working waterways, past and present, and make a major contribution to Brentford's unique sense of place.

BAAP, pg.46

Regeneration of Brentford Town Centre

Context

9.1 Brentford town centre struggles to fulfil its role as a District centre. The Council will encourage the sustainable regeneration of the town in order to provide a vibrant District centre that serves the local community well.

9.2 The town centre and canal side are characterised by a wealth of historical and natural assets which have been under valued and neglected for many years. The intention is to unlock their potential and maximise their positive impact in order to deliver a town centre that fulfils its role as a District centre, and a canal side environment which is unique in character, enjoyable and diverse in the variety of uses it provides.

9.3 An increase in town centre floorspace will be promoted by the Council in order to enhance its retail, social and community role in a manner that reflects its role as a relatively small District centre. Growth should take place within a consolidated town centre in a way that enhances the image of the town and captures the distinctiveness of Brentford's unique character. A diverse range of uses should be provided which are accessible to all.

9.4 The primary shopping area (shown on the Proposals Map) is where retail development should be concentrated.

9.5 Located on the south side of the High Street, 'Brentford Waterside' offers significant regeneration opportunities, providing a site of an appropriate size to satisfy identified retail and town centre needs, as well as the potential to deliver a distinctive town centre.

9.6 The Somerfield site offers opportunities for an improved gateway to the town centre, public parking and improved public transport links into the town.

BAAP, pg.47-48

Policy BAAP3 Regeneration of Brentford Town Centre

When considering applications for new development, the following criteria will be taken into account:

I. The contribution the development makes to the role of Brentford as a District town centre and the variety of the retail offer and consumer choice for the local community.

II. The range of uses provided, which could include social, leisure, community, health, police, arts and entertainment facilities. These should

be of an appropriate nature and scale that address the diverse needs of Brentford's community commensurate with its role as a District centre. They should offer facilities that appeal to a wide range of age and social groups during the day and in the evenings. Appropriate provision and location will be considered in conjunction with the Council's licensing policy. The Council will encourage the provision of a cultural centre/quarter that provides for a diverse range of cultural, social and community uses. Small workspaces for local artists and affordable accommodation for local voluntary and community groups will be encouraged.

III. The provision of a permanent site for the Brentford Farmers Market to enhance choice within the town centre and provide vitality.

IV. Business and residential development should be provided as part of any major mixed use retail led development proposals, adding to the health, activity and safety of the town centre.

V. The quality of design and the way in which the development takes account of and enhances the variety of historic and waterside contexts and assets within and surrounding the town centre.

VI. The way in which new uses and buildings integrate with, and enhance the town centre as a whole, providing good links and relationships with existing uses and buildings within the primary shopping area designated on the proposals map. Uses should be considered in accordance with the designation of the shopping frontages and shopping policies in the UDP. The shopping frontages within Brentford town centre are designated as follows:

Primary 203 - 225 High Street
98 - 134 High Street

Secondary 191 - 202 High Street
227 to 228 High Street
Brentford Lock, 159 - 188 High Street
79 - 97 High Street

Areas outside the primary and secondary frontage 139 High Street
77 - 78 High Street

Any additional retail frontages within the Primary Retail Area will be treated as Primary Frontage.

VII. The contribution the design and construction of the development makes to delivering a town centre that is sustainable, and resilient to the potential impacts that climate change may have upon Brentford over the next 100 years in light of the possible increases in flood risk.

VIII. The contribution the development makes to improving sustainable access to and within the town centre by walking, cycling, public transport and boat. Traffic management proposals should prioritise the use of

sustainable modes, restrain car use as appropriate, and deter through traffic. Short term parking should be provided for general public use and should be conveniently linked to the town centre. Specific attention should be given to pedestrian links to and within the town centre, between buildings and to and along the waterside. Where appropriate, new development should respect and enhance the historic access routes that run through the town centre from The Butts to the waterside where access should be provided to and from the canal.

IX. Developments will be required to ensure the protection and safeguarding of nature conservation interests within and beyond the borough boundaries.

BAAP, pg.50-51

Justification

9.7 The Council considers that Brentford town centre should aim to accommodate a net increase of retail floorspace of 5,000-6,000m² split between comparison, convenience and service provision. A new convenience store, which complements the current convenience retail offer, will be encouraged. This is based on the assumption that new retail development will increase trade retention from the catchment area contributing to more sustainable patterns of travel and has been informed by Hounslow's retail needs assessment (2007) and a qualitative assessment.

9.8 'Brentford Waterside' (Development Site M8) is the Council's main focus for town centre regeneration. It is anticipated that the scheme will involve the redevelopment of a significant proportion of town centre units located on the south side of the High Street. Accordingly, it is considered that the overall scheme should accommodate between 7,700m² and 9,250m² retail floorspace (gross) together with 3,000m² (gross) for other town centre uses such as restaurants, leisure and services.

9.9 In the event that it proves possible to relocate Waterman's Art centre within a new arts and cultural centre/ quarter, an additional 4,000m² (gross) may need to be provided. Other uses referred to in criteria (II) of the policy are all appropriate town centre uses identified either through Hounslow's Community Plan, by other service providers or have been raised through wider consultation with the local community. It is considered that their co-location within a particular area or building within the town centre would assist in reinforcing and raising the community, cultural and social role of the town centre.

9.10 Whilst this site lies within a high risk flood area, it has been demonstrated through the Sustainability Appraisal of the plan that the site meets the sequential test and that part of the proposals have been demonstrated as an exception to the requirements of Planning Policy Statement 25 Flooding as its redevelopment is considered necessary and integral to the regeneration of the town centre and will make a significant contribution to the future sustainability of the wider area. The appropriateness of uses, layouts and designs within the site will be considered sequentially and more vulnerable uses will be directed to areas with less risk of flooding.

9.11 Provision of a permanent site for Brentford's Farmers market not only adds to

the vitality and viability of the town centre, it also offers people choice, variety and a source of sustainable and healthy fresh food. The redevelopment of the town centre should take account of the benefits offered by the Farmers market and provide for a permanent site as an integral part of the town centre.

9.12 Whilst the priority is to regenerate the town centre to provide for retail, social and community activities it is recognised that uses such as residential and business uses are likely to be important to the overall viability of the proposals. These uses will help support town centre shops and services and will provide activity and surveillance during the day and at night which will help to reduce crime and add to the attractiveness of the centre as a place to live, work and visit. However, the primary aim is to regenerate the town centre and the scale of these uses will need to be considered within this context. The provision for residential and business accommodation, particularly as it will be located within a high flood risk area, is only considered appropriate because of its essential contribution to town centre regeneration.

9.13 High quality design and the way in which new development enhances the character of the area and respects the local context is particularly important in the town centre as it is within or adjoining areas and landscapes of local, strategic and international significance. Kew World Heritage Site lies on the opposite bank of the River Thames, designations relating to the Blue Ribbon Network i.e. the Thames Policy Area and the Grand Union Canal Conservation Area, directly affect much of the town centre; and conservation areas including the Butts and St Paul's lie immediately to the north. The town centre is also home to a host of listed buildings and buildings of local historic interest that punctuate Brentford's identity and act as reminders to its links with the past and in particular, the old routes, some of which still exist, between the Butts and the waterside.

9.14 An integral part of regenerating the town centre is to manage access and movement to, through and within the centre. Public transport is relatively poor for a District centre. The area also suffers from through traffic travelling along the High Street which not only dissects the town centre into distinctive northern and southern parts, but it also detracts from people's shopping experience, causes pollution, and inhibits people's movements by more sustainable modes. Parking is also very limited which not only detracts from the attraction of the shops but also results in illegal and sometimes dangerous parking along the carriageway. Prioritising sustainable movement, restricting through traffic and providing more convenient parking will act as complementary measures that will enhance the attraction of the town centre, encourage local people to support the shops and social facilities within it, and offer a pleasant environment and shopping experience.

9.15 All those involved in delivery should engage the local community at the earliest stage in the plan making process in order to promote community cohesion and social inclusion as well as learn from the wealth of knowledge and experience that they have to offer.

BAAP, pg.59

Regeneration and protection of Brentford's river and canal support facilities, infrastructure and activities

Context

11.1 Brentford's waterside character is shaped by its canal and riverside buildings, its active boatyards and the variety of established residential moorings. These assets provide a distinctive local context and offer unique opportunities for regeneration.

11.2 The Council is committed to promoting regeneration within the area that respects and enhances the contribution that these assets provide. However, many river and canal side uses and facilities in Brentford occupy sites that are often considered attractive for alternative high value uses that do not depend on a waterside location and are under increasing pressure for redevelopment. Whilst Brentford has seen a loss of these uses over the years, more recently demand for boat repair and maintenance has increased.

11.3 The Council considers that waterside industries and buildings should not be lost to other uses unless a sound case is put forward to show that they are not viable, as existing or through improvement, either now or in the future. All water related uses and facilities, including wharves, wet and dry docks, boatyards, slipways and steps can assist in achieving greater use of the waterways which is more environmentally sustainable compared to road transport and have increasing prospects of becoming competitive financially as road transport costs increase.

BAAP, pg. 60

Policy BAAP5 Regeneration and protection of Brentford's river and canal support facilities, infrastructure and activities

The Council will seek to regenerate and/ or protect existing sites, infrastructure and facilities identified on the Proposals Map, and encourage future use of Brentford's waterside for those uses that have interdependence with the water, offer access, and support greater use of the waterways for passenger and freight transport, recreation and education uses where those are viable options.

Proposals for redevelopment of, or that result in the loss of, waterway support facilities, infrastructure or activities will be refused unless it can be shown that;

- The site or facility is surplus to current or anticipated future requirements; and
- The site has been adequately marketed for support facilities uses and no realistic offer has been received; or
- Alternative facilities will be re-provided at a newly established or improved facility capable of serving the same market sector.

Proposals for redevelopment should include other water-dependant uses first, before uses that do not require a riverside location.

Support facilities and activities include boat building, servicing and repair activities, mooring sites and posts, boathouses and boatyards, slipways and other landing or stopping places, and those specifically subject to this policy are listed in paragraph 11.5 below.

Redevelopment proposals on adjoining or neighbouring sites will need to show that adequate safeguarding and appropriate mitigation measures can be introduced in order that essential infrastructure, including road access, and operations associated with water support facilities and activities are not adversely affected through the nature or location of new development e.g. new 'noise sensitive' uses will need to be delivered or located in such a way as to not limit essential boatyard operations.

Applicants should consider the provision of additional facilities and support measures that safeguard and support the continued expansion of Brentford's 'waterspace employment cluster'.

BAAP, pg.62

Justification

11.5 The sites and buildings identified on the proposals map are all considered to contribute, or have the potential to contribute, to Brentford's waterside character and the use of the waterways. The current water related facilities at each designated site are:

1. Lots Ait – open slipway, land storage, dry docks, bankside moorings and covered workshop.
2. Ferry Wharf – slipway and moorings
3. Soaphouse Creek – mooring basin
4. MSO – wet dock, two floating dry docks, slipway, covered workshop, barge crane and three grids
5. Johnson's Island – dry dock
6. Jupps Wharf – canopied warehouse
7. Ridgeways Wharf – mooring basin, land storage and slipway
8. Commerce Road – covered transshipment wet-dock and supporting warehousing

11.6 The need for boatyard facilities on the canal network in London is anticipated to grow as the number of boats on the network increases at a rate of 2.4% per annum. Safeguarding, improving and providing additional facilities is essential to the long term use and sustainability of the canals.

11.7 The strategy for the protection of Boatyards for British Waterways London Region (April 2007) identifies the boatyards occupied by MSO Services at Dock Road and Thames Lock for protection together with expanded facilities at Johnson's Island. Whilst the report does not consider existing facilities at Ridgeway's Wharf are worthy of protection, it does consider that there are opportunities to improve facilities at the boatyard as part of the package of uses proposed as part of proposal site M8 'Brentford Waterside'. Ridgeway's Wharf currently provides for a different market sector to MSO Services and also provides off-line moorings, an additional need for which has been identified across London. The site has therefore been safeguarded with a view to securing improved facilities.

BAAP, pg.65

Policy BAAP6 Large scale arts, cultural, entertainment and leisure facilities

The Council will encourage the expansion and/or intensification of use of large

scale facilities identified on the proposals map, taking account of their impact on the local community, and their potential to facilitate community cohesion and social inclusion.

Developments that have either a direct or indirect effect on these facilities will need to indicate how they can be implemented without harming the appearance and function of the facility and, where appropriate, should seize opportunities to encourage greater use and widen the scope and function of the facility.

Redevelopment and re-provision elsewhere within Brentford may be supported by the Council provided that this results in an improvement to the services offered and benefits the community overall.

BAAP, pg.66

Implementation

Policy BAAP6 will be implemented by:

BAAP Development Site Policies

...

BAAP3 Regeneration of Brentford Town Centre

The policy encourages the provision of a cultural centre/quarter and makes reference to the possible relocation of Waterman's Art Centre within the town centre.

Ensuring that the providers of large scale arts, cultural, entertainment and leisure facilities are adequately consulted on planning applications.

Planning Obligations

Seeking planning obligations where appropriate to secure the protection, redevelopment or re-provision of large scale arts, cultural, entertainment and leisure facilities

Ensuring that planning approvals make contributions where appropriate to expanding or intensifying arts, culture, entertainment and leisure facilities in accordance with the Council's Planning Obligations Supplementary Planning Document.

BAAP, pg.99-103

M8 - 'Brentford Waterside', Land South of the High Street, Brentford

The site will be expected to fulfil the key role of providing a major redevelopment site to deliver the regeneration of Brentford town centre as well as protecting and promoting waterside industries and related uses, and making the waterways more publicly accessible. Uses should include:

- Retail development
- Restaurants, cafes, pubs
- Social, community, cultural and entertainment facilities
- Service uses appropriate to a town centre
- Town centre parking
- Open space

- Residential development
- Business uses
- Waterside industries including boatyards
- Waterside uses including moorings
- Public access to, from and along the waterway
- Youth service facilities.

Whilst comprehensive site regeneration and redevelopment is favoured, the Council will consider phasing of development as appropriate provided that this is brought forward as part of a wider master plan which is deliverable over the longer term.

All proposed development in site M8 will require a detailed Flood Risk Assessment in accordance with Section 6.6.1 of the Hounslow Borough Strategic Flood Risk Assessment (SFRA).

The Council consider that the redevelopment of Site M8 satisfies parts a) and b) of the exceptions test. However, all proposals should restrict development to the permissible land uses identified in Planning Policy Statement 25, Table D.2, unless part c) of the Exception Test can be satisfied (PPS25 Table D.3 and paragraph D.9).

Existing buildings in the functional floodplain shown to be impermeable to floodwater by an appropriate Flood Risk Assessment will be considered Flood Zone 3b (Developed Areas) in accordance with section 6.4.4 of the borough's SFRA.

All development proposals will be subject to the relevant development control conditions set out in the borough's SFRA and Brentford Area Action Plan Level 2 SFRA for Site M8.

Supporting Text

Ownership	Geronimo London Borough of Hounslow Various
Existing Use	A mixed use area characterised by; -Retail units, some vacant, with residential above along the High Street interspersed with other town centre uses including a bank, pubs, post office and various cafes and service uses. -Various industrial and business uses (operational and vacant), artist studios, vacant church and open space. -A boatyard and various boat repair and maintenance activities are carried out in several areas and Wharf buildings across the site. -Off line moorings are provided within Ridgeways Basin.
Site designations/ constraints	Within the town centre boundary Prime shopping area (part) Thames Policy Area Boston Manor and Grand Union Canal Conservation Area High flood risk area (zone 3) and Functional Floodplain Protected and safeguarded boat yards adjoining and within the site Grand Union Canal Conservation Area (within and adjoining the site). Listed Buildings and buildings of townscape character within and adjoining

	<p>the site</p> <p>Historic alleyways</p> <p>Archaeological Priority Area</p> <p>Nature conservation area along the waterway</p> <p>Kew World Heritage Site (opposite bank of The River Thames)</p> <p>Public Open Space Ddeficiency Area</p>
Public Transport Accessibility Level	<p>The public transport accessibility level is poor to moderate (PTAL 2-3). There is potential to improve this through improvements to bus services along the High Street and Half Acre.</p>
Local Context	<p>Urban canal-side setting with a mix of different uses and buildings of two to four storeys.</p> <p>Character Areas</p> <p>Albany</p> <p>Brentford Dock</p> <p>Brentford Lock</p> <p>Brentford Town Centre</p> <p>Pump Alley</p> <p>St Paul's/Griffin Park Stadium</p> <p>Syon Park</p> <p>The Ham</p> <p>The Butts</p>
Urban Design – Development Principles	<p>The London Plan Density Matrix (Table 3A.2) provides guidance on appropriate densities for a site with a PTAL of 2-3 with an urban setting of 200-450 habitable rooms per hectare. The ability of the site to accommodate residential development at the upper end of this range is likely to be compromised by the need to provide a range of non-residential</p>
Key Issues	<p>TOWN CENTRE DEVELOPMENT</p> <p>The redevelopment of this site for retail led mixed use town centre development is key to the successful regeneration of the whole of the Action Plan Area. Not only should it enhance the town centre's role as a District centre, it should fulfil an important community, cultural and social role for Brentford's existing and new residents. Guidance with regard to the nature and amount of town centre development anticipated on the site is contained within policy BAAP3 Regeneration of the town centre. Given the town centre location and the relatively good public transport accessibility of the site, restrictive parking should be considered as well as providing an element of car free development.</p> <p>FLOOD RISK</p> <p>The borough's Strategic Flood Risk Assessment (SFRA) shows that development site M8 is within Flood Zones 1 Low Probability, 2 Medium probability, 3a (High Probability) and 3b (Functional Floodplain). The Council's Sequential Test (Brentford Area Action Plan Sustainability Appraisal Report – Appendix E) demonstrates that there is no alternative allocation in areas at lower risk of flooding. The whole site is within Brentford town centre where there is an identified need for additional retail floorspace of between 3,920m² and 6,460 m² by 2021.</p> <p>The Council consider that it is not possible or consistent with wider</p>

sustainability objectives for the development proposals to be located in areas at lower risk of flooding, allowing the Exception Test to be applied in accordance with Planning Policy Statement 25 (PPS25). Evidence is provided in the Sustainability Appraisal (Appendix D) on the wider sustainability benefits of the proposals for Development Site M8 in accordance with part a) of the Exception Test. The Sustainability Appraisal also identifies the site as previously developed land in accordance with part b). The Council therefore consider that the proposals satisfy parts a) and b) of the Exception Test as required by PPS25, and that the Level 2 SFRA of Site M8 demonstrates that the potential exists for development proposals that satisfy part c) and that this will need to be demonstrated as part of detailed Flood Risk Assessment. The scope of the submitted Flood Risk Assessment should satisfy the relevant requirements of section 6.6.1 of the borough's SFRA.

New development should not add to flood risk to and from new development through location, layout and design, incorporating sustainable drainage systems (SUDS) and where necessary, flood resilience measures (e.g. use of water-resistant materials for floors, walls and fixtures and the siting of electrical controls, cables and appliances at a higher than normal level).

WATER INFRASTRUCTURE

Thames Water Utilities Ltd have requested that an impact assessment is provided to assess the capacity of the local sewerage network.

WATER RELATED SUPPORT ACTIVITIES

Off-line moorings should continue to be provided at Ridgeways basin and be supported by an appropriate range of uses and facilities.

Attention is drawn to policy BAAP5 relating to river and canal related support activities. The Council consider that appropriate retention and enhancement of the distinctive role as a 'waterside employment cluster' will add to the character of the area and offer a unique image to the town centre which will attract people to the town and add to the visitor experience. Improved boatyard facilities will be encouraged and consideration should be given to a community boat yard which provides for a variety of uses including DIY repair and maintenance, education and skill transfer and public access to and from the waterways.

HISTORICAL CONTEXT

The whole of the site falls within the Thames Policy Area and the canal, basin and adjoining islands fall within the Grand Union Canal Conservation Area. The Butts and St Paul's Conservation Area lie immediately to the north and Kew World Heritage Site lies on the opposite bank of the Thames.

Whilst the majority of the site is not designated as a conservation area, it does contain numerous Listed buildings as well as buildings and features of historical merit and townscape character. Historic alleyways which led down to the waterfront are also present in some parts of the site. These include links from Church Walk to The Butts and Half Acre to the Canal. New

development should take account of these buildings and features and every opportunity should be taken to enhance their role and character.

The Council will encourage regeneration of the site that takes account of these historical assets as well as the industrial waterside heritage of the site which is unique due to its strategic location at the junction of the Grand Union Canal and the River Thames.

OPEN SPACE AND BIODIVERSITY

Much of the land south of the High Street lies within an area of public open space deficiency. It also lies within an area of deficiency in access to nature. Redevelopment should address both of these areas of deficiency. Specifically, the open land to the rear of St Lawrence's Church should provide public open space. Consideration should be given to adopting innovative designs that provide greater access to nature areas as an integral part of the development, for example, through the provision of green roofs.

COMMUNITY ENGAGEMENT AND SOCIAL COHESION

The redevelopment of this site is key to the regeneration of the town centre and should serve the local community well. Developers are encouraged to engage with the local community throughout the development of their plans and implementation of their proposals with a view to reflecting their aspirations as far as possible, providing for their diverse needs and engendering community pride in this new development which will be at the heart of the town centre.

The Developer's attention is drawn to policy BAAP3 Brentford Town Centre and policy BAAP1 Sustainable Development which offer guidance with regards to the nature of community infrastructure that may be appropriate as part of the overall regeneration of the site.

COMPULSORY PURCHASE

The land owner/ developer have made significant progress with regards to land assembly and they should continue to acquire third party interests. If necessary, the London Borough of Hounslow will consider using its compulsory purchase powers to deliver the regeneration of the town centre. In this situation, whilst the Council will make the Compulsory Purchase Order (CPO), all costs associated with it shall be underwritten by the developer. The Council will therefore be indemnified in this respect.

We would be happy to expand on our BAAP text retention suggestion above at any examination in public.

Yours sincerely,



Andrew Dakers

Chair, Brentford High Street Steering Group

ⁱ BAAP pg 21 - 'Moves towards the successful redevelopment of Brentford High Street including the development of a community vision' 5.46 The long-term goal is for the High Street to be regenerated in an economically, socially and environmentally sustainable manner. The Area Committee wishes to place emphasis and support for steps towards this goal. This includes work to achieve a clearly defined expression of the local community's vision for the future of Brentford High Street and to ensure that this vision is influential in the future development of the High Street.