

File Ref: 19050_02_05_02

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Rebuttal Proof of Evidence By Russell Brown RIBA

159 St John Street
London EC1V 4QJ
+44 (0)20 7336 8030

hawkinsbrown.com

Citroen Site, Capital Interchange Way, Brentford, TW8 0EX

LPA Reference: 01508/A/P6

PINS Reference: APP/G6100/V/19/3226914

Redevelopment of the site to provide a mixed use scheme of 441 residential units (Class C3) including 50% affordable housing with ancillary facilities, flexible uses (within Classes A1, A2, A3 and B1) and a nursery (Class D1). Comprising buildings of 12, 13, 16, 17 and 18 storeys in height, with associated cycle parking, car parking, playspace, landscaping and public realm improvements.

1.0 Introduction

1.1 I have prepared this Rebuttal Proof on behalf of the Applicant and in relation to the Proofs of Evidence prepared by the following:

- Andrew Croft on behalf of Royal Botanical Gardens Kew
- Dr Valerie Scott on behalf of the London Borough of Hounslow
- Kate Randell on behalf of the GLA
- Shane Baker on behalf of London Borough of Hounslow

1.2 This rebuttal has been prepared under the same terms as my main Proof.

1.3 I have not sought to rebut all areas of disagreement between the parties, and so the failure to identify any matter in this Rebuttal should not be taken as indication of my agreement to it

2.0 Proof of Evidence – Andrew Croft on behalf of Royal Botanical Gardens Kew

2.1 With reference to sections 8.4.3 and 8.4.4 and 10.1.9 in the conclusion – I have explained in my Proof of Evidence that Hawkins\Brown went through a process of design development that extensively assessed different layouts and heights during design development and that this was part of the ongoing dialogue with LB Hounslow and the GLA. In addition, there are also sections 7.5 and 7.6 in the original ES Volume 1 submitted with the application that address these points.

3.0 Dr Valerie Scott of behalf of the London Borough of Hounslow of Evidence

3.1 With reference to section 5.52 – I will cover points related to height in more detail below in our response to Shane Baker's Proof.

3.2 With reference to 5.53, 5.54 and Heritage points generally – Dr Chris Miele and Mark Connell will comment on these points separately.

3.3 With reference to 5.73 – Only cores 3 and 5 are above the 66m AOD referred to. Core 3 is 68.93m AOD and Core 5 is 72.08m AOD.

4.0 Kate Randell of Behalf of the GLA

4.1 With reference to section 8.49 – We note that the point made here is relevant to and addresses the point made in LB Hounslow's evidence at 6.9 referred to below in which LB Hounslow states that 75 units are below acceptable daylight/sunlight standards.

5.0 Shane Baker on Behalf of London Borough of Hounslow

5.1 With reference to section 3.14 - I note that the only reason for refusal which is being pursued In the Inquiry is LB Hounslow's first reason for refusal.

5.2 With reference to section 4.2 - The statement is not correct in saying that there are six main blocks. There are only 5. Core 1 is a single functioning building with a single core. It incorporates a step in its form and a change in brickwork to introduce a finer 'grain' and to align it with the appearance of the other 2 main massing elements (cores 2 & 3 and cores 4 & 5). This was a deliberate architectural strategy to break up the massing as much as possible without introducing unnecessary vertical circulation.

5.3 With reference to section 6.14. I comment that the selection of brick as a predominant material is a deliberate response to achieving both longevity of design aesthetics and as a means of engaging sensitively with the adjacent context (in particular the Wellesley Road Conservation Area).

5.4 With reference to section 6.15 – I make some detailed responses on height to this point and generally:

- i) Consistent with a number of other parties, the consultant team considered that the available / emerging LB Hounslow documentation regarding height was weak (by virtue of its inconsistency and lack of technical rigour) during design development and was worthy of challenging in the context of a well-designed scheme.
- ii) Other factors than heritage impact (including urban design, positioning of public open space, overshadowing, protection of residential courtyards from impact of adjacent M4 corridor) influenced the organisation and composed distribution of height across the site.
- iii) The scheme creates a community and borough benefit – more height creates more homes.
- iv) We were responding to an emerging context and composition of various schemes around the site which each had their influence on the layout and distribution of the scheme. The decision not to group the taller elements of the scheme nearest to Brentford FC had a benefit on the quality of the public realm for this part of the site.
- v) All of the design development was part of an active dialogue with Hounslow and the GLA. Advice from Hounslow was very inconsistent and only towards the end of the pre-app process did they offer any consolidated opinion regarding height.

5.5 With reference to section 6.22 - This statement is not justified. Valerie Scott does not discuss nor consider the qualities of the design which neutralise the impact of the scheme in a wider context. Material selection and the detailing of the building (with stepped and splayed profiles and brickwork detail) were deliberate devices to add further townscape interest.

5.6 With reference to section 6.64 – the benefit of the public access is not dependent on the redevelopment of the Brentford Fountains Leisure Centre. Land is given over / 'gifted' from the development site to create a new street that will allow the public realm to extend readily around the site of the leisure centre, a site which LB Hounslow has consistently stated that it wishes to see redeveloped

5.7 Further general clarifications on height relating to Shane Baker's Proof – assertions are made that benefits of the Development would be achievable through a lower height scheme. These assertions are unfounded and are not supported by any evidence presented by LB Hounslow.

6.0 Notes of Clarification on Proof of Evidence

6.1 I note that there is a discrepancy in the page numbering of my proof (no pages are missing). The numbering erroneously skips pages 65 to page 78 and should read continuously.