

To: Local Planning Authority, Hounslow

Submitted through the Hounslow Planning Portal

26 September 2025

Re: P/2025/2495 – Albany Riverside Development at 40 High Street, Brentford, TW8 0DS

We would be grateful if the comments below are taken into account in reaching a decision on the planning application.

The Friends of Watermans Park is a constituted Friends Group (29 March 2019) whose principal objective is to protect, conserve and enhance Watermans Park, its environs, and public access to the River Thames. Our comments are submitted in this context and relate to the impact of the proposed Albany Riverside development on the Park and its users.

Justification for the Albany Riverside / Brentford Police Station Scheme

The Council's proposed redevelopment of the Watermans Arts Centre site is linked through a S106 legal agreement with the delivery of an Arts Centre on the site of the former Brentford Police Station on Half Acre.

We understand the original intention was to provide an upgraded Arts Centre alongside new affordable homes at social rents on the Brentford Police Station site. These objectives were expected to be achieved using funds from the sale of the freehold of the Watermans Arts Centre site. However, the financial implications of the scheme have not, as far as we are aware, been made public. Nor is it clear how the loss of a public riverside location has been fully assessed in any cost / benefit exercise that may have been conducted.

The revised proposals for the Brentford Police Station site include a smaller space for an Arts Centre with no provision for a separate cinema. In addition, the overall provision of affordable homes across both sites is less than 20%, which is substantially below Hounslow and GLA targets. We have been unable to find a report from an Independent Viability Consultant that assesses the provision of affordable homes.

Given the actual and potential conflicts of interest that members of the Planning Committee face in assessing this new scheme, and in the absence of further information and formal consultation with the local community on a linked development of such importance to Brentford, we consider that a decision should be deferred until public consultation, including a public meeting, has taken place. The current proposals are one option that has been presented as the only option.

Notwithstanding our comments above, we have further comments on the Albany Riverside Development as currently presented, which we set out below.

Park interface proposals

We understand from the Design & Access Statement that the design team consulted with the LBH Parks team in June 2025 and that their feedback helped shape the indicative proposals for the interface with Watermans Park, including accessibility improvements to the café terrace.

It is clear from the submitted documents that the scheme envisages reconfiguring part of Watermans Park adjacent to the café to improve the relationship between the park and the development which we broadly welcome. Given the significance of this space to park users, we seek:

- Consultation scope beyond LBH Parks officers, there should be consultation with local
 community groups, including the Friends, regarding the reconfiguration of the park including
 how the detailed design of the park interface (including planting, seating, and access
 arrangements) will be developed.
- 2. **Maintenance and management** clarity is needed on the long-term care of this interface space, including whether responsibility falls to the GreenSpace maintenance team, the development's management company, or a shared arrangement.
- 3. Accessibility landscape drawings show steps at café frontage while technical plans (DAS Part 3, p. 37) confirm short accessible ramps will be provided alongside steps. We note a step free level access entry to the café terrace from the park but an additional ramp alongside steps would be welcome.
- 4. **Public toilets** we consider that as a condition of approval the café should be required to provide **public access to toilets** during its opening hours. This would represent a significant benefit for park users, especially given the limited nearby current provision.
- 5. Water access we consider that as a condition of approval there should be means of providing access to water for use in the park from the development. Water pipes from a drinking fountain near the children's play area were laid in the park in 2021/2022 but could not in the end be connected to a water supply by the Arts Centre. A connection to the drinking fountain along with an external tap or standpipe to support watering of new planting and trees within the interface area and Watermans Park would help sustain biodiversity and relieve pressure on volunteer and Council teams.
- 6. **Height of Block E** the increased height of the Block E nearest the park will also increase shading across the park at the end of the day and should be refused. There has been no consideration of the impact on a public space. There are a large number of documents dealing with the daylight/sunlight/overshadowing impacts on both sites. However, so far as I can see, there is no assessment of these impacts upon Watermans Park.
- 7. Proposed tree removals at the park entrance the submitted Arboricultural Impact Assessment (PCA, Aug 2025) recommends removal of three individual trees (G1 Sweet Gum) at the Watermans Park entrance that are said to be close to proposed basement excavations and a tree within the park close to the boundary (T1 Turkish Hazel). All these trees are visually attractive and contribute to the park entrance character and are noted to have a life expectancy of 30+ years.

There is a conflict with the Landscape Plan (PCA Aug 2025) section 10.3 which notes "The Entrance. At the entrance from the park side, three existing mature trees in hard landscape are retained, preserving local character and biodiversity. Two others, which are in decline, will be sensitively replaced to maintain continuity in canopy structure and visual screening. The existing line of tarmac footpaths within the park will be retained and connected

seamlessly with the proposed development. This ensures smooth pedestrian flow while respecting the site's established rhythms of use."

Given the Arboricultural Impact Assessment confirms the trees are healthy with a long life expectancy and attractive and there is an aim of respecting the existing access routes to the park we consider that alternative design adjustments should be considered to retain all the Sweet Gum trees and the Turkish Hazel.

The Brentford Town Centre Masterplan 2024

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(https://www.hounslow.gov.uk/info/20061/regeneration/1243/brentford_town_centre_regeneratio n) approved in March 2024 identified that further investment in Watermans Park was needed to match significant projected population increases (see pages 12, 13, 22). Watermans Park will be a significant benefit to the residents of the Albany Riverside Development and we consider that a condition of approval should include further investment in the park as identified in the Town Centre Masterplan. Such investment, as well as park interface proposals, could include:

- A community garden: the 2021 park re-landscaping masterplan identified a discreet area of approx 500sqm close to the eastern entrance as suitable for a community garden.
- Removal of steps to exit the park from the restored board walk to make the park truly accessible
- Community influenced artwork.
- Display of heritage assets from the river.
- Support for the creation of a heritage harbour alongside the park and development. Most of
 the waterside frontage at Albany Riverside will face directly on to the stalled Waterman Park
 moorings (Phase II). The constraints and opportunities presented by the mooring
 development are not mentioned in the documentation.

The Council have previously confirmed they will support the Friends in creating a community garden subject to funding.

Thames Path

Many visitors to the park are walking along the Thames Path and we welcome the proposals for a step free access route alongside the development. However, this step free route only goes as far as Smith Hill.

We consider that part of the development's planning gain contribution should be applied to create step free access across Smith Hill.

Construction Management Plan

Planning conditions should ensure uninterrupted access to the park during construction works.

The developer should be required to prepare a Construction Management Plan prioritising delivery / removal of materials by river wherever feasible. Any damage resulting to the park during construction must be fully restored.

Sincerely

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