

OBJECTION TO THE PLANNING APPLICATION TO REDEVELOP THE TESCO SITE - SYON LANE, TW7 5NZ

submitted by the Osterley & Wyke Green Residents' Association, November 2020

Ref: 01106/B/P137, P/2020/3100

Outline planning application with all matters reserved except access for the demolition of existing building and car park and erection of buildings to provide up to 1,677 residential homes, plus up to 5,000sqm flexible non-residential space comprising commercial, business and service space, and/or learning and non-residential institution space, and/or local community space, and/or public house/drinking establishment, and/or a mobility hub, along with associated access, bus turning, car and cycle parking and landscaping arrangements.

INTRODUCTION

OWGRA's Objections

The Osterley and Wyke Green Residents' Association (OWGRA) understands the need for housing developments to meet known demand. We do not object to the redevelopment of the Tesco site for mainly housing, as the site is in the Great West Corridor Opportunity Area identified by the London Plan. However, we have examined this application carefully and have identified many areas in which the application falls short of planning guidelines and various planning targets. We believe that many of them taken alone form a sufficient basis for rejection of the application. Taken together we believe that they make an overwhelming case for rejection.

Development Planning Context

The Local Plan was confirmed in 2015 and is currently undergoing review in 2020. the Great West Corridor (GWC) Local Plan Site Allocation document of 2019 sought to create at the Tesco site a mixed-use development with housing and an enhanced public realm which integrates with its surroundings with tall buildings (defined as over 20m) even though 5 to 8 storeys was recommended for the site in the GWC Masterplan.

In the GWC Local Plan Review (site allocations 2 and 11), dated September 2020, the above recommendation has now changed to 61 to 82m AOD (ordnance datum, above sea level) effectively to 17 storeys in a new 2020 draft of the Masterplan. Given the enormous change between the site specifications in the existing Plan and the draft Plan it is very difficult not to see this as an afterthought designed to make room for the proposed development rather than a change made on the basis of an objective assessment of the site's potential.

There has been no public consultation on the new draft in advance of any examination in public and any future approval by DCHLG. It was placed on the meeting agenda of 15th September 2020 of LB Hounslow's Borough Council for an 'update report' but the item was withdrawn on the day with no reason given. Therefore the 2020 documents do not comprise 'material consideration' in taking decisions on planning applications.

OWGRA's objections are in the context of the 2015 Hounslow Local Plan, the GWC Local Plan Site Allocations 2019, The London Plan 2016 plus the emerging London Plan 2019 and the National Planning Policy Framework 2019.

SUMMARY OF OWGRA'S OBJECTIONS TO THE PROPOSED DEVELOPMENT

1. Community Engagement

The consultation process with the local community was not transparent and the results of the developer's surveys are unverifiable. It was an expensive box-ticking exercise, a sham and a waste of our time. Our major concerns about excessive height of the proposed development and problems with transport and traffic have been largely ignored. Such evidence as is publicly available from the developer's collection of local views (e.g. the two Facebook pages) showed overwhelming opposition to the scale of the development. We believe that this local opposition is also reflected in the letters of objection written by local residents. This application does not have the support of the local community.

2. Context and Character of Surrounding Area

The proposals take no account of the lie of the land with the site being much higher than the areas to the north, and east particularly. The development's bulk and height up to 17-storeys would be wildly out of character with the surrounding area and would dwarf and dominate its suburban and historic surroundings of mainly 2-storey houses. There would be a considerable negative impact on the context and character of the area.

3. Building Heights, Massing and Design – The Design Code

The proposals would have a detrimental effect on surroundings, they would overpower and intimidate with their mass, bulk and height. There are 10 instances where the distance between buildings is less than the prescribed minimum recommended distance of 18m. The design echoes the area's commercial and industrial buildings of some 3-5 storeys but is disproportionate at heights of 2-17 storeys.

4. Housing Density

2-17 storeys of 1677 homes with only 25 houses. This is too dense at 20 times higher than the rest of Osterley, offers a poor quality of life for future residents and exceeds approved Local Plan Site Allocation 2. This makes for an unacceptable step change in comparison with most of the surrounding built environment.

5. Housing Type, Quality and Size of Accommodation:

Lack of privacy and overlooking given other buildings' proximity. Few (9%) 3-bed homes, almost half are single-aspect only, poor outlook, balconies above lead to poor daylight below.

6. Daylight, Sunlight & Overshadowing

Effect on daylight and sunlight to existing properties, scale and density of development would have an adverse effect on neighbouring homes through close proximity, overshadowing and loss of privacy. Many houses on Oaklands Ave and Syon Lane will be particularly adversely affected.

7. Housing Needs and Affordability

There is a housing need in Hounslow, and Hounslow Council's own Housing Strategy document for 2019-2024 states that there is a desperate and growing need for "larger family homes" (3-4 bedroom homes) to prevent forecast overcrowding in a glut of smaller-sized properties. This development fails by a large margin to meet objectively assessed local housing needs, as only 9%

of dwellings would have 3-bedrooms. The Council's own objectively measured assessment shows that the combined need for larger family homes in the Market and Affordable sectors combined is 57%. The proposed smaller sized flats are not only unsuitable for families, but also very unlikely to be affordable on the private sale market, by the average family in Hounslow.

8. Transport, Traffic & Parking

- 8.1.** The only proposed improvement to public transport would be one additional bus route from Osterley to Ealing Broadway (E1). There is no funding for much needed improvements to rail services (Hounslow Loop, Piccadilly line upgrade, Southall Rail Link, West London Orbital). Hounslow Planners should consider and reject the planning applications on the merits of the existing PTAL 2 (poor), which is wholly inadequate for developments on this very significant scale. The national financial crisis eliminates hopes for future funding.
- 8.2.** The developer and TfL don't agree on whether traffic will increase or decrease at Gillette Corner in the future; the developer opts for a reduction in traffic with no evidence to support this claim.
- 8.3.** Apart from the proposal for an additional right turn lane from the A4 eastbound into Syon Lane southbound, which is designed to enhance access to the Homebase site development, the two developments provide nothing else to address their combined impacts on the already congested Gillette Corner.
- 8.4.** Parking provision at 0.25 spaces per dwelling is much lower than the recommended 1 space per dwelling in PTAL 2, which is unacceptable with no significant improvements to public transport in the foreseeable future.

9. Environmental Aspects, Sustainability, Climate Emergency & Ecology

- 9.1.** The proposed development does not comply with the Climate Emergency declared by the GLA and L B Hounslow in December 2019. Mitigation measures have been ignored.
- 9.2.** Renewable Energy sources are not exploited, and a substantial proportion of heating and hot water would come from fossil fuels.
- 9.3.** Only a very modest 36% of the energy consumed will be Zero Carbon, with the remainder provided by fossil fuel, using gas-fired boilers. This completely undermines L B Hounslow's pledge to be Carbon Neutral by 2030. The proposed design fails to achieve true Zero Carbon, as the resultant Residual Carbon emissions is substantial (957 Tonnes CO₂ per year) and is mitigated by paying into a Carbon Offset Fund. The substantial Residual Carbon CO₂ emissions are equivalent to those emitted from 210 average family cars driven for a whole year. The proposed tall buildings are not environmentally friendly, due to their intensive use of concrete and steel, which constitute a significant part of CO₂ emissions.
- 9.4.** No allowance is made to further reduce Carbon emissions as required by the London Plan.
- 9.5.** The thermal design of buildings and type of heating and ventilation systems used, do not reflect the step-change needed for high standard of sustainability.
- 9.6.** No justification is given for demolishing the "Tesco Extra" building, as part of addressing the Circular Economy, which is an integral part of sustainability, particularly in the current economic climate.
- 9.7.** A significant damage to local biodiversity will occur as 150 of the existing 177 trees on site will be removed. It will take many years for biodiversity to recover from this avoidable damage.

10. Infrastructure

The location does not fulfil the requirements of a 15-minute neighbourhood as many of the

amenities are further than 15 minutes' walk. Local infrastructure is already bursting at the seams, before the addition of thousands more residents, causing a negative impact on social infrastructure.

11. Local Heritage

The proposals would overwhelm and hide from view Grade II Listed buildings, the Gillette Building and Tower and the 'Goals Soccer' Pavilion.

12. Education

There is inadequate provision of primary school places in the area, and this problem has not been addressed in the planning application. There are probably sufficient secondary school places.

13. Landscaping & Amenity Space

The amenity space proposed is less than the area required in the Local Plan, and much of it would be at podium and roof level. There would be a lack of privacy due to close proximity of other blocks of flats. Some areas would be affected by inadequate sunlight and wind.

Given the failure of this application to meet so many key planning guidelines and important local targets OWGRA urges the Planning Committee to reject these proposals. OWGRA's considered view is that the development should be on a scale that respects the local area and which meets the housing needs identified in the Council's documents. It needs to be more caring for the wellbeing of its residents and environmentally friendly. A redesigned proposal no higher than six storeys would be acceptable. This could still provide much-needed housing, possibly 600-800 flats and houses (i.e. more than the 450 proposed in site allocation 2), and associated business, commercial and community space which would have a better chance of integrating into our established community.