

# OBJECTION TO THE PLANNING APPLICATION TO REDEVELOP THE HOMEBASE SITE - SYON LANE, TW7 5QE

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

Ref: 00505/H/P19, P/2020/3099

Full planning application for the demolition of existing buildings and car park and erection of buildings to provide 473 residential units, a replacement retail foodstore with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking (400 customer spaces and 105 residential spaces), landscaping and associated works.

## 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 Homebase site, including a new Tesco store, 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 substantially 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 Homebase site a place of character with a distinct identity which integrates with its surroundings with tall buildings defined as over 20m; 5 to 8 storeys was recommended for the site in the GWC Masterplan.

In the GWC Local Plan Review dated September 2020 this has now changed to a range from 61 to 82m AOD and with Homebase at least 3 storeys above AOD 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 15<sup>th</sup> 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. Planners and Planning Committee members need to be clear that this application does not have the support of the local community.

## 2. Context and Character of Surrounding Area

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 proposals would have a detrimental effect on surroundings, they would overpower and intimidate with their mass, bulk and height, especially the 2-storey homes to the west on the Northumberland Estate and to the south on the Trees Estate. There is inadequate set-back from the Great West Road and Syon Lane given the volumes of pedestrian and vehicular traffic.

## 4. Housing Density

The development is too dense at 15 times higher than the rest of Osterley. It offers a poor quality of life for future residents and exceeds approved Local Plan Site Allocation 11. This makes for an unacceptable step change in comparison with most of the surrounding built environment.

## 5. Housing Type, Quality and Size of Accommodation:

The layout of half of the flats is inadequate with single aspect windows, some north-facing, some floors with inadequate circulation space and ventilation, Lack of privacy and overlooking given other buildings' proximity. Few (14%) 3-4 bed homes.

## 6. Daylight, Sunlight & Overshadowing

The scale and density of development would have an adverse effect on neighbouring homes through overshadowing and loss of privacy.

The developers have acknowledged the potential for **solar** glare from the proposed highly glazed buildings for road and train drivers but have offered no solution.

## 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 14% of dwellings would have 3-4 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 Local Plan states that new developments should have a minimum of 25% of such larger homes. For smaller developments this minimum may sometimes be acceptable. For a development on this scale the mix should reflect known housing needs. In any case this development meets neither of these targets. 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 0.21 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 (283 Tonnes CO<sub>2</sub> per year) and is mitigated by paying into a Carbon Offset Fund. The substantial Residual Carbon CO<sub>2</sub> emissions are equivalent to those emitted from 65 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 CO<sub>2</sub> emissions.
- 9.4.** No allowance is made for future proofing 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 current Homebase building, as part of addressing the Circular Economy, which is an integral part of sustainability, particularly in the current economic climate.
- 9.7.** Significant glare would be caused by the large and curved façade of Block A (building at corner of A4/Syon Lane junction above the new Tesco store). People adversely affected

would include drivers using the A4 and Syon Lane, train drivers, residents on Syon Lane/Northumberland Gardens, as well as pedestrians and cyclists. No measures have been proposed to eliminate or reduce glare.

- 9.8.** Tall buildings can cause significant wind turbulence. Wind Tunnel tests highlighted areas where adverse wind conditions would render them unsuitable for their intended use eg roof-terrace amenity areas, areas used by pedestrians and cyclists around the site, entrances to some of the residential blocks, the nearby bus stop and railway station. Although some mitigation measures are proposed to remedy the adverse wind microclimate conditions e.g. planting of trees, they are insufficient to extend the beneficial use of certain areas. For example, the roof-terrace amenity areas would only be suitable for use during summer conditions. This approach is considered to be very restrictive, given the extensive landscaped areas earmarked for use by flat-dwellers. An additional problem affecting the roof-terrace amenity areas is the self-shading caused by adjacent residential blocks, which will further restrict the times of using them as intended.

## **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 the following Grade II Listed Buildings, the Gillette Building and Tower, the Syon Clinic (former Coty) building, the Adini Building.

## **12. Education**

There is inadequate provision of primary school places in the area, and this problem has not been addressed. 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 with significantly restricted use due to adverse microclimate conditions. Communal podium gardens are 20% below standard for the new population and reliance is placed on 'public accessible streetscape'; no outdoor children's play space within 400m apart from podium. Lack of privacy due to proximity of other blocks of flats.

## **14. Fire Strategy**

**14.1.** All proposed residential blocks feature only a single staircase, contrary to the recommendations from RIBA (Royal Institute of British Architects), following the Grenfell Tower fire tragedy, for two staircases.

**14.2.** There are shortfalls in compliance with Fire Engineering Codes and Regulations.

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, approximately 200 flats, as well as the new Tesco store and associated business, commercial and community space.

## 1. COMMUNITY ENGAGEMENT – a tale of non-engagement

The Developer's **Statement of Community Involvement (SCI)** runs to 134 pages. Its length, however, should not be taken to reflect real engagement.

In this document the developer has stated its intention to "...build relationships with key stakeholders...", "...gather aspirations and understand the views of the local community..." and "...be inclusive, accessible, transparent & engaging..." (all from page 5). We will show below that, in reality, the developer's engagement has been minimal, it has been slow to respond to questions and suggestions and unwilling to consider alternative options.

The developer set up a Community Liaison Group (CLG). There was overwhelming consensus from CLG meeting attendees that the entire series of meetings and exhibitions organised by the developer have been a box-ticking exercise. This is clearly shown by the lack of action taken to address residents' concerns, and to modify the design or plans based on the feedback and engagement sessions with the community. We believe this is also demonstrated by the dwindling numbers of attendees over the 3 exhibitions, and 6 CLG meetings. It was clear that no changes were being made to the plans in line with concerns and feedback being provided and collected between the consultation milestones. We also think our goodwill in pointing out obvious errors and omissions, given our intimate knowledge of the area, has been ignored and even cynically abused.

### 1.1. The Consultation Policy

This Developer's SCI contains the following passage:

*"The NPPF sets out the Government's planning policies for England and is a framework in which Local Plans can be produced. The document states that applications which seek effective and proactive engagement with communities and other interested parties should be looked favourably upon."*

The reverse side of this coin must be, we suggest, that developers who do not engage in effective engagement should be looked on less favourably.

The levels of attendance at developer events and other means of engagement with the local community show that this has not been achieved by the developer. Examples of how each communication channel has failed to meet expectations is contained within this objection statement and is evidence of why the planning application has failed to meet the conditions for meriting the "favourable" treatment mentioned in the NPPF.

### 1.2. Consultation Cabin

11,000 consultation flyers were delivered by the developer. However only 100 people attended the Consultation Cabin (set up by the developer in the Tesco Extra Osterley car park) over 5 months of residence for 7 hours per week (from mid Oct 2019 until National Lockdown mid March 2020). The Cabin location was not in a well-lit or visible location, nor in a high footfall area. It was neither signposted, nor advertised in the Tesco store. It is fair to say it went unnoticed by the majority of visitors. The cabin was also found to be shut on the advertised dates in March with no explanation given.

### 1.3. Leaflet Distribution

The developer claims that 6,000 were distributed, but this could not be corroborated. There were major issues with the initial delivery company which had to be replaced due to issues of competency and reliability reported by local residents via OWGRA who had not received the leaflets despite

being confirmed to be within the catchment delivery area. There were also problems with delivery of the developer's brochures and letters in August and November; no response was received to our e-mails with queries on these problems.

#### 1.4. Community Walk Arouns

During autumn 2019, the developer organised two Community walk arounds, the purpose of which was *"for local residents to point out what currently does and does not work well in their area. This was also an opportunity for the design team to develop a greater understanding of the area and how their proposals could begin to respond to the key priorities for the community"*.

Those OWGRA members who attended both walks brought pertinent issues to the attention of the developer e.g. poor provision of public transport, pedestrian pathfinding, dangerous right hand turns from Syon Lane onto the A4, and increased congestion. The developer promised to take these concerns into consideration and feedback into the design process, but this has not been the case as these issues have not been adequately addressed. Again, this clearly shows that the exercise was just a box-ticking exercise rather than genuine desire to take into account the views of the local community and address them in the design process.

#### 1.5. 3D Model

This was promised by the developer from the outset of the engagement with the local community and formation of the CLG (29/10/2019). It was queried at every meeting held, and multiple emails sent chasing its materialisation, all responses were vague but still held promise.

24 July – OWGRA sends list of queries including an update on the promised 3D model.

26 July – told the 3D model is on hold due to in person consultation being stopped, but would look at producing one to exhibit in the Tesco store.

4 August – OWGRA requests an update on the status of the 3D model.

10 August – Developer confirmed there had been progress on the 3D model and public exhibition and would update later in the week.

Throughout August various information requested, including 3D model updates, model never addressed in responses.

28 Aug (subsequently chased for response on 4 & 7 of September) – information on Model completion requested.

7 Sept – Developer finally responded and stated the 3D model was "still in production, and that the model maker was taking slightly longer than anticipated."

11 Sept – Decision taken by OWGRA to commission own model due to unreliability and lack of transparency from developer on this drawn out topic.

w/c 5 Oct – 3D model delivered (3 weeks after commissioning), photographed, newsletter designed/printed/delivered to local community informing of forthcoming exhibition of 3D model.

12 Oct - The developer informed the Local Ward Councillors they would be showcasing a 3D model outside Tesco on the 15 and 24 October, there was no model. When queried where the model was, developer responded they were not satisfied with the quality of the model so are still working on it - 7 weeks from the email stating it was "still in production"!

22 & 24 Oct – 3D to-scale model commissioned by OWGRA exhibited outside Nishkam School (Tier 2 COVID-19 precautions/restrictions), attended by c 150 people. Feedback from residents was that OWGRA's 3D model helped them to appreciate the impact of the excessive mass of the proposed development in relation to the surrounding 2-storey homes.

23 Oct – request to Tesco to have a stand outside the store, just as the developer has been doing, but this was refused by Tesco.

1 Nov – brochure delivered to local community from developer informing that their two 3D models would be exhibited in the Tesco car park 4 & 7 November (subsequently cancelled due to lockdown.)

The developer's broken promises and failure to produce a 3D model led OWGRA to commission its own 3D model and incur unnecessary costs by paying for it out from its modest funds.

It took OWGRA 3 weeks to get a 3D model made, and at the time of writing (more than 3 months after the announced commitment from the developer to produce one) we have still not seen one. We conclude that there was never any intention by the developer to produce the promised 3D model and that they only decided to produce one once they found out that OWGRA had one. Even then the process has become extremely protracted and the model still hasn't appeared!

#### 1.6. The "Give My View" Surveys

The developer set up two Facebook Feedback pages for the development. The first was set up on 11 October 2019 and the feedback received through it was overwhelmingly hostile to the development largely on the grounds of its height and massing.

<https://www.facebook.com/GiveMyViewTech/posts/820614401687245>

The few posts supporting the development seemed to come from outside the area. This was difficult and time consuming to check but we found that one such supporting contribution came from Brazil. The Second FB survey (set up on 8th October 2020) produced a similar result.

<https://www.facebook.com/GiveMyViewTech/posts/1106246243124058>

We have the evidence to prove what we are claiming and can supply it if requested. Finally, a web page was also set up with a questionnaire which consisted almost entirely of leading or irrelevant questions. We made a critique of the first questionnaire. After that we no longer had the resources (or the will) to follow the questionnaire's latest iterations:

<https://www.givemyview.com/syonlanefuture>

These online surveys have been cited by the developer as a clear example of community engagement. The responses we had access to (e.g. the Facebook responses) were overwhelmingly critical of the development. We have had no access to the feedback on the online questionnaires and without that we simply do not believe the claims of local support. Also, many local residents reported that they did not receive a single pop up in their Facebook sessions informing them of the surveys.

Data claims – 6,663 pieces of written feedback / 493,663 people reached / 3,571 unique voters

Yet the key findings presented by the developer are based on only 1,396 responses. Where is the full report on all the responses? We asked the developer for a breakdown by postcode of the responses on numerous occasions, but this has still not been provided to date.

#### 1.7. Written Feedback

The developer claims they received 3,000 pieces of individual written feedback, however there is no evidence of this quantity in the developers SCI. It is therefore assumed that online comments and reactions are being counted as "individual pieces of feedback", many of which no longer exist due to deletion and re-posting of relevant ads on social media several times a day.

#### 1.8. Public Exhibitions

The attendance at the developer's exhibitions was very low. The local community was clearly not made sufficiently aware of them, or felt that if they were to attend their opinions were not welcomed or would not have any impact on redesign/alteration to the developers plans. (*Numbers*

*of OWGRA organised events referenced to show context of what is possible to achieve when proactive about community engagement*

*(OWGRA Information Evening for Residents – 100+ attendees at single evening event, 20 Nov 2019)*

Public Exhibition 1 – 87 attendees over 2 dates, 21 feedback forms

Public Exhibition 2 – 66 attendees over 2 dates, 7 feedback forms

Public Exhibition 3\* – 2 attendees (virtual) providing feedback

*(OWGRA Public Exhibition – 150 attendees over 2 dates, 22 & 24 Oct 2020)*

\*The developer made the decision to move Public Exhibition 3 to online due to COVID restrictions. OWGRA and CLG Members showed that such cancellation was avoidable and provided a list of appropriate outdoor venues where a public exhibition could be held adhering to COVID guidelines. The developer did not explore these avenues, and as noted above, only 2 members of the public engaged with the final (virtual) exhibition.

In contrast, OWGRA has had 150 visitors over 2 dates (22 & 24 Oct), during Tier 2 COVID restrictions, with far fewer resources and less experience than the developer. OWGRA organised and advertised an exhibition in under 2 weeks. The cumulative attendance matched that of all 3 developer-led public exhibitions.

This above clearly illustrates the developer's lack of interest in serious engagement with the local community over the year they claim to have organised community engagement.

#### **1.9. Feedback Forms from Developer-led Exhibitions**

The developer's analysis of feedback is extremely dubious. Only 19% of attendees returned feedback, which OWGRA feels cannot be considered a quantity sufficient to be used as data for graphs intending to be a representation of local community views.

Nevertheless, the key themes from the small catchment of local residents' feedback can be summarised below – all points which have not received adequate consideration or concrete action to mitigate within this planning application:

- Celebration of local assets
- Sightlines for key views retained
- Concerns over improvements to already strained Public Transport
- Impact on social infrastructure. e.g. health services unable to absorb the significant increase in population.

Whilst the developer has projected an image of harmonious relations, in reality we have been treated as an inconvenience and as an obstacle to be overcome. At best, scant regard has been paid to our attempts at forging links with the developer with the exception of the promise of an unobstructed view of Gillette Clock Tower from the 'Meander', there has been neither compromise nor concession from the developer on any other points raised. OWGRA also strongly believes that one sight line from a particular point within the development **does not** sufficiently meet the requirements of protection and celebration of local assets.

#### **1.10. Response to Feedback Claims**

The developer claims that it has responded to local concerns about the massing of the Homebase development. But, as we suspected from the outset, the extreme height of the proposed buildings was an opening gambit in order to be able claim responsiveness to local concerns. The height has

been reduced slightly but the massing remains the same (the number of homes and mix is the same). The point is that even with this ‘concessionary’ and derisory height reduction, the development is still completely out of any sort of compatibility with the adjacent built environment.

The decision to marginally reduce the height of the buildings (very front of D & E) to the frontage opposite Northumberland Gardens 2-storey homes was nullified by increasing the height of other blocks so the massing remained unchanged. OWGRA representatives informed the developer of our belief that 7 storeys is still excessive and completely overbearing to the modest 2 storey residential grain of Northumberland Gardens (directly opposite) and Northumberland Estate stretching to the West of the site.

The developer stated, following the 2<sup>nd</sup> Public Exhibition, that “Respondents generally felt that transport and traffic and local infrastructure” were the most important concerns – “other areas worthy of consideration were the requirement for a GP surgery and to discuss the impact of tall buildings”. These issues have been disregarded (see elsewhere in this document), clearly demonstrating further disinterest in and disregard for the justifiable concerns of the community.

#### **1.11. Youth Engagement via Youth Ambassador Programme**

This was heralded by the developer as a prime example of how they were engaging with the different sectors of the community. However, the programme had barely got off the ground before being halted due to lockdown. This is yet a further example of the developer using the pandemic as an excuse to arrest engagement with the local community, rather than finding creative alternatives to continue what they should consider valuable engagement. If there has been any youth engagement, where are the findings and conclusions? Or is this another example of lip service and box ticking?

#### **1.12. The Community Liaison Group (CLG) Meetings**

The developer set up the CLG in late 2019 and stated that *“The purpose of the group is to be involved in detailed discussions with the design team. The group acted as a continuous sounding board to discuss specific issues and concerns within the local community.”*

After the CLG meeting in June 2020 the developer stated that *“CLG members showed particular interest in understanding the impact the development would have on key views in the area and it was agreed that a further session would be held to share this detailed information”*. The images were not provided in a timely manner and OWGRA sought an independent architect to create sight line imagery as well as the aforementioned 3D model showing the impact of the development on the surrounding area commissioned by OWGRA.

It should be noted that early in the consultation process, during a CLG meeting, the Transport Consultant promised to provide virtual simulated traffic models at the Gillette Corner junction. Nothing happened. We are still waiting. Another broken promise.

On numerous occasions we sought reassurance from the developer that gas boilers would not be installed in the development. We were told that energy provision would be from heat pumps. We are disappointed to see that gas boilers will in fact be installed in the developments, as heat pumps are incapable by themselves of delivering the full amount of heat required.

Throughout the process the developer claimed that the project team has sought to incorporate local feedback and has reflected this in design changes where appropriate; and that the design evolution process was regularly communicated at the CLG meetings. Excepting the tokenistic reduction in height of Blocks A and B by 2 storeys and the insertion of inset balconies, this is untrue. At all times,

OWGRA has sought to remain engaged with all facets of the development and to keep communication channels open. Impediments to this have all come from the developer and each time the plans were presented at the CLG meetings there was very little change to anything based on feedback provided. At least 2 OWGRA representatives were present at every CLG meeting, and each time we opposed the tower heights of 17 storeys which we were promised that CLG concerns would be fed into subsequent design revisions. However, at every meeting they continued to show 17 storeys in the drawings.

The developer spent a disproportionate and excessive time at meetings presenting landscaping proposals at the expense of addressing the fundamental concerns expressed by residents on building heights and transportation problems. Ironically, the proposed landscaped areas would fall short of requirements, and their use would be restricted by self-created environmental problems.

### **1.13. OWGRA Written Communication**

OWGRA submitted a comprehensive letter of suggestions and possible enhancements to the developer's plans on 9 February 2020, which was acknowledged, and a response promised to us the following week. This was chased for a response on 13 March when submitting further correspondence, and only actually responded to on 8 June. This does not demonstrate a willingness to engage with local residents allowing 3 months to pass by without any discussion on vital points of the scheme and site plans, even though this period covered lockdown, when the developer was preparing the planning applications.

OWGRA's response made it clear that it regarded a medium-rise development (up to six storeys) as appropriate and acceptable. The developer has not reduced their maximum height from 17 storeys throughout this entire consultation process despite the many calls from OWGRA, CLG members and residents to ensure closer alignment with the 2-storey residential home maximum edging the site. We see this as a blatant disregard for the local area, its residents' views and wellbeing.

OWGRA also submitted an official response to the 2nd public exhibition on the 13 March. This led to a promise of further consultation events in June to show revised proposals. There was no further consultation – the barely changed plans were shown at the CLG meetings in July and August available virtually in lieu of a 3<sup>rd</sup> exhibition; no further discussion was to be taken into account.

### **1.14. Planning Application – paper copies**

The developer was reluctant to provide us with paper copies of the planning applications. Ideally, we would have liked not to waste paper but the documents were often difficult and slow to load up onto a computer (awkward non-standard sizes, large files and difficult to read print size and light colour) and the format was often unwieldy to read easily on a small screen. It took many weeks of e-mails to and fro and persistence before succeeding in getting them to print a few copies of the major documents for us.

The Design and Access statement is a case in point. The document is in A3 format and the file containing it weighs in at a full 125 MB. On an average home computer set up it is very difficult to read the document and many will have machines that will balk at files of 125 MB. No thought has been given as to how this information (which is supposed to be a non-technical account of the proposal for the benefit of Councillors and the general public) could be presented in a way that would encourage viewing.

The quality of much of the developer's documentation over the whole process has been poor. Non-standard paper sizes difficult to see on a small laptop screen, far too much information crammed

onto exhibition boards, often using pale font colours, almost impossible to read on a screen or in printed format. We brought these design issues to the attention of the developer on numerous occasions over the last few months, but nothing changed, so we had to struggle on.

#### **1.15. Engagement Opportunities**

The developer claims that "...opportunities were provided...in a number of in-person and online formats in order to aid accessibility and maximise engagement", however predicated upon the developer's own figures, their engagement process has, as we have argued, shown no real desire to engage. This has disenfranchised the young, the mobility-impaired and those inexperienced in online communication, e.g. the significant number of our elderly citizens locally.

The developer claims they "will continue to take on board ideas and suggestions which could further enhance benefits of development". In the light of our above analysis it is very difficult to see in this anything other than the hype of a salesman, and an approach that paid lip-service to fundamental issues, such as sustainability and the true well-being of future and current residents. As an active local residents' association we will continue to engage with whatever forums the developer holds. We will continue to represent local area appropriate views for the regeneration of the Homebase (and Tesco) site, and will continue to expose and document the misleading communication and the overall lack of transparency by which this developer engages.

In conclusion, it would appear that the developer feels confident enough not to pay too much attention to the justifiable concerns of the residents, and to simply proceed unhindered with full development proposals for the Homebase site.

## 2. CONTEXT AND CHARACTER OF SURROUNDING AREA

OWGRA hopes readers will look at our description of the area surrounding the Homebase site as much is omitted from the applicant's submission, particularly the lie of the land.

The Homebase site sits at the junction of the Great West Road (GWR) and Syon Lane and is 1.8ha (3.5acres). It rises from the slope down Syon Lane to the high 'ridge' at GWR so has a very prominent position in the area. Immediately opposite and to the west are 2-storey inter-war houses and moderne-style maisonettes, to the north are more recent 2 and 3-storey houses and flats. To the south, with the railway line between, is the 'Trees' Estate comprising more inter-war houses surrounding a communal garden and community centre. The current Homebase building is of unique design, a large prefabricated single storey warehouse supported by a tower designed by Nicholas Grimshaw and Partners built in 1987/8 (not 1998 as stated in the D&A pg 17). However, in 2019, the structure was given a certificate of immunity from listing for 5 years by Historic England. The customer car park for 295 spaces sits at ground level (not in an undercroft, as stated by the developer (D&A p13)).

This site is equally important sitting at the junction of the industrial and commercial 'Golden Mile' Great West Corridor to the east. The area is strongly influenced by significant volumes of traffic negotiating the GWR and Syon Lane interchange at Gillette Corner and various highway paraphernalia including a petrol station diagonally opposite on GWR.

Many of the commercial buildings immediately to the east are Art Deco in style, including the Grade II listed Gillette Building and NatWest Bank immediately opposite to the north. and the Syon Clinic to the east after the Skoda dealership. The Gillette Building, with its prominent clock tower, is an important landmark and a focal point in the area.

The land along which the GWC runs is at its highest point at the Gillette junction and falls away towards the north, east and south. An average height of 4 storeys of mainly commercial buildings on GWR works satisfactorily especially as the bulk of those developments such as the Syon Clinic are well set back from the road. Where there are other tall buildings along GWR (such as GSK, Great West House, The Mille, all located at the junction of Boston Manor Road and the Great West Road), they are also well set back and start at a much lower level than the land at the Homebase site so that their visual impact is relatively lower.

The land on the opposite corner westwards has recently had development consented (and is under construction) for Access Storage to 4/5/6 storeys on the former Shell Garage at 891 GWR. An extension for offices and workshops attached to the listed Adini Building and flats at the rear of that in a separate building to heights of 4/5 storeys, accessed from Northumberland Avenue were won on appeal.

OWGRA's view is that the proposed development is far too tall and bulky for its position on high ground and would dwarf and dominate everything else around it. It would have a significantly harmful effect on the character and appearance of the surrounding area and would also harm the setting of the listed buildings, especially, but not only, the Gillette building directly opposite it.

The proposed development would therefore not comply with Local Plan policies CC1, CC2, CC6 and SC4 and London Plan policies 7.4, 7.5, and 7.8 which collectively seek to ensure that development represents high quality design, positively responds to its context and conserves and takes opportunities to enhance the qualities of the area including the significance of the Borough's

valuable heritage assets. The proposal would also fail to conform to the objectives of the NPPF to achieve well designed places and to conserve the historic environment.

### **2.1. Set-back of development from GWR and Syon Lane**

The Homebase site is on the corner at this highest point and is set back within its car park. No attempt has been made to set the proposed development back in any substantial way. It is designed to sit close to the junction of the GWR with Syon Lane at some 14-17 storeys; if anything, the construction proposed is so close to the road and footway making it not 'to celebrate the corner' as the applicant claims but would be a quite oppressive and intimidating presence. There is an approximate 4m deep set-in designed at the curved pedestrian entrance to the new Tesco store at the junction of Syon Lane and GWR to accommodate cyclist parking and aid pedestrian safety especially close to the subway under the GWR. OWGRA considers this to be inadequate.

OWGRA notes that there is a minor set-in from the footway along Syon Lane with small areas of landscaping to safely accommodate pedestrians and cyclists, essential especially during morning and evening travel to and from workplaces and they have introduced a new pedestrian route along 'Syon Gate Way' to the south but this is also to be used for servicing and delivery vehicles. OWGRA considers that the set-in is inadequate in appearance and on safety grounds and does not deal with the overbearing frontage to the Tesco store.

We do not believe that this design complies with Local Plan policy CC2 urban design and architecture and policy EC2 developing a sustainable local transport network to cater for the very substantial increase in number of residents.

### 3. BUILDING HEIGHTS, MASSING AND DESIGN

Local Plan policy CC2 (urban design and architecture) aims for new buildings to function well and minimise any negative impact on the surrounding area and to respond to its character, layout, grain, massing and height of existing buildings. It also states that they should have a positive impact on the amenities of current residents. OWGRA considers that the proposals do the opposite in terms of heights to 17 storeys, which would be like nothing else in the area and the effect is to overpower and intimidate.

We find it difficult to understand the developer's claim (in pg 78 of the D&A) that building B1, for instance, '[its] architectural language transitions from the Art Deco to the more traditional domestic architecture of B2B3'. These 3 'B' buildings are 17 storeys going down to 12-15 storeys, hardly domestic in nature and have the stark vertical appearance and brown colour typical of 1960s tower blocks at their worst.

OWGRA also note that buildings B2B3 are allocated as 'affordable rent', surely disappointing for future residents to take pride in their homes.

Along Syon Lane other buildings have random coloured bricks at one side and the D&A (pg 79) shows a green wall, but we understand this is unlikely to be created given inherent fire risk.

Some buildings have protruding balconies, quite unsightly, and surely a security risk for future residents, though no doubt added to make up for the shortage of accessible open space in the development.

The overall appearance of a mishmash of styles is not unified by horizontal and groupings of coloured brickwork as the developer claims, rather it turns the whole development into an incoherent mix of separate buildings of haphazard design as if each had been taken from random pages of an architect's copy book.

The design, appearance and choice of construction materials are not in keeping with the local distinctive style of white rendered 2-storey houses and maisonettes. This creates a negative impact on the context and character of the area and is in breach of Local Plan policies CC1 (context and character), CC2 (urban design and architecture) and CC3 (tall buildings).

The proposals would cause serious harm and should be rejected as non-compliant with Local Plan policy CC4, heritage and London Plan policy 7. Other grounds for objection are dealt with in this document.

OWGRA has made its views known to the developers that the very tall series of buildings up to 17 storeys appears overbearing and inappropriate at Gillette Corner. We would like to see something similar to recent developments in our area which are in keeping with its suburban domestic character (see Figure 1 below) much of which is endorsed by the Osterley Park and Spring Grove Conservation Areas, recently updated.

FIGURE 1

Meadowbank Close, Osterley Road



Campion House/Marbaix Gardens, Thornbury Road



Golden Court, London Road



### 3.1. Individual buildings' design

While Building A is described as Art Deco style with the curved and staggered west-facing, fully glazed frontage at the corner, it does not readily fit with the existing low-level, angular Art Deco and listed buildings adjacent, most importantly the Gillette Building itself. Only the 3-storey listed Adini Building to the west along the A4 has a minimal curve at its corners, echoed by the curved-edge 'cirttal' windows of some of the surrounding homes built at the same time.

While there may be other types of Art Deco styles elsewhere in the country and modern interpretations of them, OWGRA's point is that the Gillette landmark building plus the Wallis Building further east in the GWC, both in the angular style, the only ones surviving demolition, making them unique in historical terms and that should be respected (see Figure 2). Therefore this proposal is not in accordance with Local Plan policy CC4, heritage.

**FIGURE 2**

Gillette Building



Wallis Building



- 3.1.1. **Building A** goes from 6 to 12 storeys west to east. It has a curved, fully glazed frontage and is the pedestrian entrance to Tesco for shoppers. It has mainly **horizontal** lines design with the top six tiers curving dramatically and reducing in size. Its focal point is the entrance to the new Tesco store with outstanding and dominant Tesco logos.
- 3.1.2. **Building B1** is described as a townscape marker and is 17 storeys high with **vertical** lines designed making it look much taller and sitting oddly next the Skoda Garage and Syon Clinic of 3 storeys and horizontal lines, which are completely dominated.
- 3.1.3. **Buildings D & E** are 7-8 storeys high directly opposite Syon Lane and Northumberland Gardens 2-storey homes. These have mainly **vertical** lines appearing overly bulky and out of character with the area. The scale of these three tall sections of building facing 2-storey residential homes looks disjointed and out of proportion. The attempt to 'maximise daylight and sunlight' to Syon Lane homes by splitting up the mass does not work aesthetically. LBH Local Plan Context and Character Study says properties within 500m should not be affected by tall buildings; multi-coloured brickwork will not mitigate this harm caused to much of the Northumberland Estate.
- 3.1.4. **Building C** is 10 storeys and described as an 'arrival building' opposite Syon Lane railway station. It seems to have structural **vertical lines** with **horizontal white brickwork** at floor 2 and part-3, plus protruding balconies to the southern side elevations overlooking Brambles Close across the railway line.
- 3.1.5. **Buildings B2 B3** is described as an 'articulated skyline' with a **vertical** design and range from 9, 10 and 15 storeys high and has a new pedestrian and cycling 'Syon Gate Way' street frontage directly to the south and east of it.

The applicant argues that they are not attempting to dominate the local character but in OWGRA's view that is exactly the effect of their proposals, overly tall, bulky and dominant in a style alien to the local grain and therefore in breach of Local Plan policy CC3 tall buildings.

The designer seems to have had difficulty deciding **whether to emphasise vertical or horizontal banding** and the development as a whole looks disjointed and not designed at all. It does not capture the qualities of existing Art Deco buildings.

#### 4. HOUSING DENSITY

The development specifications (D&A pg 2) are 473 'high quality homes' in blocks from a 4-storey podium to 17 storeys, 38% affordable housing (on a habitable room basis), new 'modern Tesco retail store of c.10,550sqm', community space (GIA) of 200sqm (14m x 14m), 137sqm flexible commercial, business and service space (GIA).

With 42% 1-bed flats, 44% 2-bed and only 13% 3-bed and 1% 4-bed flats, the majority do not meet Hounslow's identified need for larger family homes. They are intended for some 1,100-1,500 residents. The density of the homes at c 300 per hectare appears to be 15 times higher than the rest of Osterley and Spring Grove Ward properties which is essentially suburban in character with a density of c 5K homes over 300 ha, excluding Osterley Park and a population of c 13.5K. The proposals are well in excess of the specifications from the GWC review site allocation 11 of 340 units over 5 to 8 storeys in total and therefore contrary to Local Plan policy SC4 scale and density of new housing.

## 5. HOUSING TYPE, QUALITY AND SIZE OF ACCOMMODATION

OWGRA is pleased to note that 10.1% homes are allocated as wheelchair adaptable in line with Building Regulations Part M across all tenures and evenly distributed and that a number of construction methods e.g. reinforced walls and ceilings make future adaptation for disability devices easy. The applicants D&A statement at 8.8 'considers the needs of older people and those with small children...and those with disabilities 'to maximise independence, comfort and dignity.'

However, the following problems remain unresolved.

### 5.1. Housing Quality

The claim (para 82 of Planning Statement) is that 65% of flats have dual or 'semi-dual' aspect to allow 'passive ventilation, daylight and privacy and avoid overheating'. No figures are given, but fig. 8.16 shows 17 full dual and 18 semi-dual, plus 31 single aspect; this is more like 53%. However, the applicant states that only the corner properties are truly dual aspect.

### 5.2. Daylight, Sunlight, Overshadowing, Outlook

No figures are available for north-facing flats with single aspect but these are remedied by 'pop-out' balconies or a 'good outlook to the podium garden', especially in buildings B2B3.

### 5.3. Noise and Air Quality

Balconies at buildings A and B1 are inset, presumably to try to mitigate noise and poor air quality from GWR and Syon Lane though the applicant claims in D&A 8.6.3 'all external private amenity spaces enjoy good air quality and noise levels' and in 8.5.12 that 'windows can be in the shade from others' balconies and achieve cross-ventilation from them'.

OWGRA considers that the proposals do not comply with the Local Plan policies SC4 on scale and density of new housing development and SC5 on ensuring suitable internal and external space; there are too many flats with single aspect windows, some north-facing and bathrooms leading directly from kitchens and living rooms with no separating wall, some floors with inadequate circulation space and ventilation. With 42% 1-bed, 44% 2-bed flats, only 13% are 3-bed and 1% 4-bed so most are not true family homes. There is a lack of privacy and overlooking given other buildings' within the development close proximity to a number of flats.

**A further consideration is that the Council's Local Plan Context and Character Study says properties within 500m should not be affected by tall buildings. With their proximity to existing local homes the proposals are therefore in conflict with Local Plan policy CC3 (tall buildings).**

## 6. DAYLIGHT, SUNLIGHT & OVERSHADOWING

### 6.1. Effect of daylight and sunlight for existing homes

The scale and dense massing of the three tall sections of building facing 2-storey residential homes on Northumberland Gardens and the Northumberland Estate is inappropriate and out of proportion with these modest suburban homes. The attempt to 'maximise daylight and sunlight' to Syon Lane homes by splitting up the mass does not work aesthetically. Planning guidance for privacy provides for achieving visual separation at a minimum distance of 18-21m between facing homes but the Housing SPG says these need not be adhered to in city sites. However, this is not a city site, it is across the road from 2-storey suburban homes on Syon Lane, Northumberland Gardens and Brambles Close where the separation distances are crucial when adding high-rise blocks. '50% of the building frontage above level 4 described (Planning Statement pg 70) as being open frontage with sky views' is simply not acceptable and will cause harm to existing residential homes given the sense of enclosure they would cause.

While the applicant says the massing has been 'redistributed' by narrowing the profile of the taller elements of buildings D&E in response to consultation, it does little to mitigate the harm to existing residents' amenity. They still have a 4 or 5 storey minimum height and the towers are 7 and 8 storeys high. They dwarf the 2-storey homes opposite in Northumberland Gardens and those on the other side of the railway line, especially in Brambles Close, depriving them of natural daylight and sunlight as well as causing direct overlooking and loss of privacy.

The Council's Local Plan Context and Character Study says properties within 500m should not be affected by tall buildings; multi-coloured brickwork will not mitigate this harm caused to much of the Northumberland Estate. The proposals are therefore in conflict with Local Plan policy CC3 (tall buildings).

The developers have acknowledged the potential for **solar** glare from the proposed buildings for road and train drivers but have offered no solution.

## 7. HOUSING NEEDS

“We need the homes” is what we are hearing.

Yes, we do need more homes, but not at any price. The need for homes should not, and must not, obviate the need to carefully base decisions on planning guidelines. Otherwise we might as well abandon the planning system altogether. It is the Council’s policy that what we need is good quality homes which meet identified needs. In the case of the Tesco/Homebase development neither of these would be the final result because, contrary to planning guidelines,

(1) the developments as proposed would degrade the local built environment and would not create the streets required to build local communities,

(2) the sizes of the homes proposed do not match the housing needs identified in Hounslow and (3), as a result of (2), it is predictable that, given the growing disparity between the price of homes and the average wage, the proposed homes will become the overcrowded homes of the future.

Another thing to be borne in mind is that developer's images of the future community life of their developments are often unrealistic and therefore should not be taken as the way their proposals will develop over time. This applies, for example to the viability of commercial space below residential developments. Artists impressions show attractive piazzas with cafes, restaurants etc., however where is the evidence of that happening? Most new developments seem to have empty retail/commercial units e.g. Great West Quarter in Brentford, Dickins Yard in Ealing Broadway.

Consider points 1, 2 (and 3) above in turn (our emphasis in bold).

1. Large numbers of people living in close proximity does not by itself produce a community. Communities develop as a consequence of physical layout, street scenes, local resources, shops and town centres and the like. The physical layout and location of the proposed buildings lends itself to none of this. People living in high rise developments are likely to feel trapped in many different ways. Surveys have confirmed that almost no one wants to live in a high-rise development. Feeling trapped is not a good basis for community cohesion. Low-rise and medium rise (up to 6-storeys) has to be the way forward.
2. Hounslow Council's own **Housing Strategy** document for 2019-2024 (adopted in November 2019) repeatedly makes the point that there is a serious overcrowding problem in Hounslow and that the biggest need is for larger family homes (i.e. homes with 3 or more bedrooms). In that document we read:
  - a. “... the trend towards population growth is set to continue for the duration of the current strategy. ... More people potentially exacerbate the mismatch between demand and supply of housing in the longer term, and in the short-term drives up purchase and rental prices at all levels of the market.” (pg 20)
  - b. “In Hounslow, we expect the increased number of children and adults aged between 30-59 will create demand for larger family homes over the next four years. The number of young adults between 18-29 is projected to decrease by 1.1%, **a situation that could potentially diminish demand for smaller properties in the private rented sector.**” (pg 20)
  - c. “In England, the median house price to income ratio increased from 5.8 in 2002 to 8.6 in 2017. In Hounslow, over the same period, the affordability ratio increased from 7.9 to 13.8. With a ratio of prices to earnings of nearly 14.1 **in Hounslow, home ownership without significant subsidy is beyond the reach of most Hounslow Residents.**” (pg 26)
  - d. “**Most new homes built in Hounslow between 2010 and 2017 were flats rather than houses, and were typically one or two-bedroom properties, leading to a decreasing proportion of family sized properties between 2010 and 2017. The increase in professionals migrating into the borough will generate demand for larger properties, a fact**

demonstrated by the indication of a greater need for three and four-bedroom homes in the 2016 Hounslow Housing Market Assessment (SMHA). In 2015, the Local Plan stated both one-bed and three-bedroomed properties should each form a 25% proportion of new build in the borough, but housing delivery during the last strategy period remained skewed toward smaller properties due to the long pipeline of properties under construction.” (pg 27)

- e. **“Overcrowding in both private and social housing continues to be a significant issue for a sizeable proportion of Hounslow residents,** driven by the pressures of population growth and migration outlined above. **At the time of the 2011 census, there were 20,704 overcrowded households in Hounslow, an increase of 34% from the 2001 figure,** aligning with the increase in average household size in the borough. Overcrowding is technically defined as occupancy in which a couple or single adult shares a bedroom, and where children’s occupancy exceeds two per bedroom. These conditions are three times more prevalent in the private rental sector than in owner-occupied properties and four times more likely to occur in social housing.” (pg 28)
- f. The **Hounslow Housing Marketing Assessment** for 2016 analysed the mix of home sizes for the borough. This showed that 49% of homes have three bedrooms or more. So, it is not surprising that with the growing population of the borough Hounslow's **Housing Strategy** document points out that there is a pressing and growing need for “larger family homes” (3 bedrooms or more). Seen in the context of this identified need it is clear that the housing size mix in the proposed development does not reflect need. It has 42% 1-bedroom, 44% 2-bedroom, and only 13% 3-bedroom and 1% 4-bedroom homes. So, 86% of the homes do not answer the need for larger family homes.
- g. At a Local Plan Review briefing in October 2020, the Executive Director explained that of a new homes need of 27,000, at least 11,000 (41%) need to be genuinely affordable and 52% (14,040) need to be larger family homes. These volumes cannot be delivered by blocks of flats of the type proposed and would be more suitably provided in low to medium-rise housing.
- h. The **London Borough of Hounslow Strategic Housing Market Assessment Update (October 2018)** gives details on overcrowding in Hounslow and on the need for homes of various sizes:  
 4.21 For Hounslow, overcrowding increased from 13,633 to 20,704 households (an increase of 7,071) over the 10-year period 2001-11 (Figure 20). The percentage of overcrowded households has also increased from 16.2% to 21.8%. When considered by tenure, overcrowding has increased by 647 households in the owner-occupied sector, increased by 1,355 households in the social rented sector with the largest growth in the private rented sector where the number has increased from 3,702 to 8,771, a growth of 5,069 households over the 10-year period. The percentage of overcrowded households in the private rented sector has also had the biggest increase from 27.7% to 37.5%. Percentages for Greater London and the English average are also shown. (page 34).

A table on page 53 makes clear the scale of objectively assessed needs for larger family homes. The contents of that table for the point considered here can be summarised as follows:

TABLE 1

	Market		Affordable		Total	
	#	%	#	%	#	%
<b>1 or 2 bed</b>	6,800	33%	7,900	57%	14,700	43%
<b>3, 4, 5+ bed</b>	13,700	67%	5,900	43%	19,600	<b>57%</b>
<b>Total</b>	20,500		13,800		34,300	

## 8. TRANSPORT, TRAFFIC & PARKING

### 8.1. Transport Assessment

Improvements to public transport are essential and becoming urgent, not only to support the anticipated increase in residents resulting from two proposed significant developments, but also due to more people being encouraged to use bus and rail services. The current **Public Transport Accessibility Level (PTAL)** of 2 is poor and needs to be upgraded to 4. The implementation of the substantial rail and bus services improvements is essential prior to the completion of the two large developments.

The developer is offering to support only a very small proportion of the improvements needed to accommodate the proposed substantial developments. The developer appears to believe, wrongly, that these developments will just attract significant funding from others, to finance and implement essential roads and public transport improvements in time. This is not supported by evidence and does not reflect the seriousness of the public and private financial climate in the short and medium term.

There are very significant uncertainties related to both the availability of funding and timescale needed to implement the necessary road and public transport improvements. This is particularly critical in case of rail services, given the substantial funding and long timescales involved.

The Tesco and Homebase sites have been reviewed simultaneously because their transportation needs and related issues are totally intertwined, and hence any improvement measures need to be very closely coordinated.

Each of the Tesco & Homebase developments is required to fund mitigation measures, as per the planning obligations set out in a development-specific Section 106 Planning Agreement. Since the introduction of CIL (Community Infrastructure Levy), the Section 106 Planning obligations have become limited.

### 8.2. Residential Travel Plans

The trip predictions and travel patterns in the report (Table 4.1) rely on a local census (**2011**) which indicates that about **60%** of residents rely on trains, tubes and buses.

Firstly, this percentage is likely to be higher in **2020**, and increase further as more people are encouraged to use public transport. Admittedly the long-term effect of COVID-19 cannot be fully predicted at this stage. Secondly, it is absolutely essential to implement all necessary improvements to public transport **prior** to any increase in residents' numbers, as a result of the proposed developments.

### 8.3. Public Transport Improvements

The Transport Assessments reports for both developments incorrectly state: "There are a number of public transport and pedestrian/cycle infrastructure improvements committed in the local area. This includes the proposed Golden Mile Station, an extension of the West London Orbital rail line, as well as improvements to the Piccadilly line and South Western Railway services. **These commitments will improve the PTAL (Public Transport Accessibility Level) rating of the site to a level 4.** These measures are likely to come forward to support the Opportunity Area, regardless of the outcome of the planning application to which this report relates." It is misleading to describe these unfunded schemes as "**committed**", when in fact, there is currently **no prospect of these schemes getting the**

**necessary DfT or TfL funding**, for reasons outlined below. This is likely to remain the case for a very long time, particularly in the current condition of government finances.

### 8.3.1. Future Rail Services

The Homebase and Tesco sites are in the “Great West Road Opportunity Area” designated for developments. Necessary improvements stated in the Report are in the “West Corridor Strategic Transport Study (2019) and the Mayor’s “Adopted Transport Strategy” (2019).

The Planning applications for both developments claim connectivity benefits from mooted, but **unfunded, unapproved Public Transport schemes** that would, if delivered, increase these PTAL (Public Transport Accessibility) levels. These include:

***The West London Orbital Overground***: running from Hounslow and Kew Bridge towards Hendon and West Hampstead. **This is not a funded proposal.** There is no certainty it will ever be prioritised and funded by TfL or DfT.

***The Southall Rail Link*** (Golden Mile station): trains linking Brentford to a planned Crossrail station at Southall. **This is not a funded proposal.**

The application claims that Network Rail has carried out a feasibility study identifying a preferred option to be taken forward for implementation. It is understood that this study was funded by TfL LIP funding, but there is no evidence of any substantive capital funding for implementation. This project is not listed in DfT Rail’s RNEP pipeline, and there is very little likelihood it will ever be prioritised for DfT RNEP funding.

**South Western Railway** access to Heathrow Airport, which involves a new rail line to extend the **South Western Railway** access service to the Airport. **This is not listed in the RNEP scheme at any stage of project development** (Note: the Western Rail Access to Heathrow, which would connect Heathrow to West of England, is included, with a ‘Decision to Develop’ - i.e. produce an outline business case).

To conclude, there are no available funds or firm timescales to implement improvements for the above three projects, which involve substantial capital costs and significant timescales. Hence improvements cannot be relied upon to be in place prior to the completion of the Homebase and Tesco developments.

### 8.3.2. Existing Rail & Tube Services

Necessary improvements: Accessible services are listed below. They are currently running up to maximum capacity and need to be upgraded to cope with the anticipated increase in number of residents on a significant scale.

**There is no evidence of any assessment made of the impacts on the capacity of Syon Lane rail station and train services – these could be very significant considering the scale and proximity of these developments, in particular the Homebase site development, and the limitations on residents’ car parking forcing a shift to rail and other sustainable modes.**

- **South Western Railway** (Hounslow Loop to Waterloo) from Syon Lane.

Proposal to introduce capacity improvements. **This is not a funded proposal**

- **Piccadilly Line** (Heathrow branch) from Osterley.

The long-overdue Piccadilly Line track and signals upgrade (60% capacity increase) due in 2024, is one of many schemes that have been **shelved for the foreseeable future**. (Note: TfL have stated that upgrade cannot be implemented without DfT funding. Whilst the Piccadilly Line trains have been ordered, their operation will offer very limited increase in capacity, without the shelved line upgrade project).

It is evident that there are **no available funds or firm timescales to implement the necessary Rail and Tube improvements**, prior to completing the Homebase and Tesco developments.

#### 8.4. Buses, Cycle Infrastructure & Other Means of Transport

The existing bus services and cycle infrastructure will be unable to cope with the increased use by new residents. Substantial improvements are essential and need to be put in place prior to the occupation of the new developments.

- **Bus Rapid Transit and improved bus services** – the draft s106 heads of terms for both applications propose a contribution to improved bus services. It is expected that TfL will request a significant financial contribution from the developer to improve local bus services.
- **Improved cycle infrastructure** – specific reference is made to enhanced connectivity to be brought by **Cycleway 9** – but Cycleway 9 is funded only from West Kensington to the eastern end of Brentford Town Centre. A future extension to Hounslow Town Centre is mooted, but not funded, and TfL's financial crisis means there is no certainty that it will be funded and implemented in the near future.
- **Boston Manor Boardwalk** (from Sky Campus to Boston Manor tube station). This is currently unfunded.

Again, that there are no available funds or firm timescales to implement the above improvements, prior to completing the Homebase and Tesco developments.

#### 8.5. Public Transport Accessibility Level (PTAL)

The anticipated future PTAL levels are summarised in the Great West Corridor Strategic Transport Study, Full Report (May 2019), dealing with both buses and rail. However, the report contains capacity improvements options, which are contingent upon the availability of funding and acceptable timescales, to implement various packages to reduce crowding and improve connectivity and PTAL.

The existing PTAL of these two development sites are very low (Tesco site PTAL 2; Homebase site PTAL 2) and simply unable to support sustainable developments on such a significant scale. The report acknowledges that the current PTAL is poor, mostly at 2. The Report proposes to upgrade PTAL from 2 to 3, then to 4.

Improving PTAL requires public sector investments in wider Strategic Transport Infrastructure, with cumulative developer contributions, collected by L B Hounslow Planning authority in the form of Community Infrastructure Levy (CIL).

There are no available funds or firm timescales to achieve PTAL 4. Such uncertainties are accentuated by the inherent nature of rail projects which require substantial funding and lengthy timescale for up-grading. It is evident that the necessary improvements to PTAL are very unlikely to be in place prior to the completion of the proposed developments.

## 8.6. Road Traffic Assessment and Modelling

The **Great West Corridor Strategic Transport Assessment (May 2019)** identifies the need to ‘balance the strategic role of the A4 with the Healthy Streets aspirations’. This **includes improvements to key junctions on the A4 at Syon Lane, Boston Manor Road, Windmill Road, Ealing Rd and Chiswick Roundabout**, with junction optimisation measures to be brought forward with each development.

This does not appear to be reflected in the two planning applications. Comments on the report are listed below:

- **Traffic Modelling:** There is no clear evidence that the consultant’s assumptions have been rigorously verified and agreed by TfL and LB Hounslow. Also, whether TfL and Hounslow have accepted the consultant’s findings and recommendations.  
It is not clear who would be responsible for monitoring the actual traffic conditions against the assumptions made, and then be responsible for taking the necessary measures, including any rectification of the solutions implemented.
- **Traffic Growth Predictions:** TfL traffic predictions cover the period 2019 to 2031. The year 2031 represents the “future year” in TfL’s (LoHAM) Model. It is not clear whether these predictions account for any of the proposed Homebase and Tesco site developments.
- **Future Growth Predictions (item 11.5.3):** TfL asked that no growth should be applied from 2031 to 2035. The reason for lack of increase for 4 years is not explained.
- **Gillette Junction Traffic (item 11.5.4 & Tables 11.1 & 11.2):** TfL’s Model (LoHAM) applied to A4/Syon Lane predicts an increase in traffic flow from 2019 to 2031. This does not agree with the consultant’s prediction of reduced traffic flows, particularly that their computed reductions apply only to Syon Lane North.
- **Proposed Highway Layout: (item 11.11.4):** The suggested improvements only involve adding a second turning lane from the A4 into Syon Lane South, and a new traffic signal control junction for the Homebase site. The suggested improvements are unconvincing, given the need to allow reasonable crossing times for the anticipated increase in cycling and pedestrian traffic. These improvements are not practical and reasonable.
- **Crossings for Cyclists and Pedestrians (item 11.12):** At Gillette Corner, the impact of human traffic at crossings (cyclists and pedestrians) has not been duly considered.
- **Traffic Signal Timings (item 11.12):** The consultant is proposing to use the traffic signal model (VISSIM) to optimise traffic signal timings, to benefit bus services operation. It is unclear whether this will have an adverse effect on waiting and crossing times for cyclists and pedestrians.
- **TfL Model Audit (item 11.3.3):** TfL requested that the traffic flow in “Design Year” 2035 be considered as higher than the existing flow in 2019. However, the consultant is predicting lower traffic than existing by year 2035, which is the assumed completion date for the two proposed developments. This is unconvincing.
- **Design Year proposed for Traffic Model:** The “Design Year” in the model is 2035. However, the model does not account for the much earlier Homebase site completion. No interim results and recommended improvements are made in the report to cater for the earlier completion of the proposed Homebase site.
- **Predicted Car Trips:** The Tesco site Transport Assessment concludes: “As a result of the development, and the associated development of Homebase, Syon Lane, an overall reduction in car trips is predicted locally. This reduction is significant on Syon Lane, north of the A4, where the reduction in trips is as a result of the Tesco store being relocated to the south of

the A4.” The Homebase site Transport Assessment concludes: “As a result of the development, and the associated redevelopment of Homebase, Brentford (sic), an overall reduction in traffic movements can be expected. This reduction would be particularly pronounced (sic) on Syon Lane north of the A4 Great West Road, where the reduction in traffic can be expected to be in excess of 3000 trips over the course of a typical day.” The logic behind the above conclusions is not at all evident, considering the very significant trip generation expected from such large-scale developments, in addition to the growth in background traffic flows predicted by TfL.

- **Overall Traffic Assessment** (item 11.14): the report states that “Overall the assessment demonstrates that the residual cumulative impact of the development on the road network will not be severe”. It might not be severe, but yet very significant.

The two major Homebase and Tesco site developments are expected to cumulatively and individually exacerbate significantly the traffic conditions at the already congested Gillette/A4/Syon Lane junction. These conditions are very likely to cause unacceptable impacts on all road users, including the existing local community, as well as the many new residents who will ultimately join the local community. If these critical conditions are fully understood by prospective purchasers, it may have a detrimental effect on the development values.

In both planning applications, the developer’s technical advisers appear to have followed the transport assessment and traffic modelling methodology prescribed by DfT and TfL. They state “TfL has suggested that background traffic flows in the design year 2035 would be higher than existing and have asked the applicant to make reference to TfL’s London Highway Assignment Model (LoHAM). Whilst evidence from DfT counts suggest traffic levels have fallen, for robustness TfL’s requested approach has been adopted.” Nonetheless, both developments TAs remarkably conclude that the proposed developments separately and cumulatively have a beneficial impact across all modes of transport, and incredibly including a reduction in traffic.

We should note here that after the debacle of traffic forecasts in the planning applications for the Nishkam School in 2015 (where the Transport Consultants grossly underestimated traffic volume, whereas the local community accurately forecast current high traffic volumes) we have very little confidence in any traffic forecasts, particularly where they involve ‘finger in the air’ guesswork rather than forecasting based on hard scientific analysis of historic data and knowledge of the area.

#### **8.7. Planning Consent & Infrastructure Requirements (ItP London Plan)**

In accordance with the Intend to Publish London Plan, Policy D2 – Infrastructure Requirements for Sustainable Densities - the borough is required to work with the developers and infrastructure providers to ensure that sufficient infrastructure capacity will exist at the appropriate time to enable the development, and, if necessary, to ensure that the development is phased in a manner that it will be delivered only when that capacity is in place.

Otherwise, the Borough Planners must consider and reject the planning applications on the merits of the existing PTAL levels, which are wholly inadequate for developments on this very significant scale.

#### **8.8. Impacts on Local Transport Network – s106 Funding**

The impacts of the proposed developments on the local transport infrastructure should be mitigated by measures funded through the developments’ s106 agreements. These measures provide highway access to the respective sites, and facilities for walking and cycling around the sites’ perimeter. They

are simply essential for the developments' viability. Very limited transport improvement measures are offered by the developer as listed below

Apart from the additional right turn lane from the A4 into Syon Lane south, 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 A4-Syon Lane junction. This is the only measure proposed by the developer under the Homebase s106 proposal.

### **8.9. The s106 Heads of Terms (Tesco & Homebase Developments)**

The s106 Heads of Terms for the two sites have been reviewed simultaneously because their transportation aspects are intertwined, and hence they need to be mutually compatible and coordinated.

Both developments have draft s106 agreements that include **very limited transport improvement measures by the developer** as outlined below. These measures are primarily essential for the viability of the respective developments.

#### **8.9.1. Tesco Site s106 Heads of Terms – Local Transport Impacts Mitigation Measures**

- Amendments to cycle route along Syon Lane (development frontage).
- Delivery of pedestrian crossings on Grant Way and Syon Lane.
- Delivery of bus stops on Grant Way.
- Payment of contribution towards improvements to bus services with contribution to be phased with delivery of homes.
- Identifying and committing to delivery and retention of 10 car club spaces; Membership of car club for first occupants.
- Plan for managing deliveries and servicing arrangements.
- Plan for managing allocation of spaces and access arrangements within the car parks.
- Agreement of travel plan to promote sustainable travel.
- £100 voucher paid to occupiers to encourage green travel modes.

#### **8.9.2. Homebase Site s106 Heads of Terms – Local Transport Impact Mitigation Measures**

- Segregated cycle way along the Great West Road (development frontage).
- Introduction of a two-way right-hand turn from the Great West Road to Syon Lane south (to enable better access to the development site from the west).
- Removal and relocation of bus stop to further east down the Great West Road (displaced to make room for cycleway improvements; increasing walking distance to bus stop)
- Junction signal realignment.
- Payment of contribution towards improvements to bus services.
- Identifying and committing to delivery and retention of 2 car club spaces; Membership of car club for first occupants.
- Plan for managing deliveries and servicing arrangements.
- Plan for managing allocation of spaces and access arrangements within the car parks.
- Agreement of travel plan to promote sustainable travel.

- £100 voucher paid to occupiers to encourage green travel modes.

### 8.10. Transport Infrastructure Funding

The notes below are included by way of background, to support some of the conclusions reached by OWGRA following the review of the Developer’s Transport Assessment Report.

- **Note 1:** TfL are in a very severe financial crisis. They are seeking very substantial emergency funding from DfT, without which they claim they will be unable to operate their services, let alone invest in infrastructure. Crossrail continues to be a significant drain on TfL finances, with uncertainties about time and total cost for completion.

As stated above, TfL have indefinitely shelved the Piccadilly Line upgrade.

- **Note 2:** DfT (as with other central government departments) is under severe budget pressures. DfT is following government policy to prioritise the north of England when allocating available transport funds.
- **Note 3:** the funding of National Rail projects is no longer determined and provided by Network Rail, but by DfT Rail. DfT Rail allocates its funding through its Rail Network Enhancement Pipeline (RNEP) policy. This is heavily oversubscribed with a long list of unfunded major rail projects across the country competing for funding, including many unfunded priorities in the north of England. Neither the West London Orbital nor the Southall Rail link nor the South Western Railway access to Heathrow feature in the RNEP funding programme, and are highly unlikely to achieve sufficient priority status to do so.

### 8.11. Residential Parking

The developer is proposing 100 residential parking spaces for 473 homes on the current Homebase site (0.21 spaces per household). This is considerably lower than the standard in the Draft New London Plan as shown in the table below.

TABLE 2

Location	Maximum parking provision
Outer London PTAL 4 Outer London Opportunity Area	up to 0.5 spaces per dwelling
Outer London PTAL 3	up to 0.75 spaces per dwelling
Outer London PTAL 2	up to 1 space per dwelling

The site is in PTAL 2, where the provision should be up to 1 parking space per home. Even if we take into account that the site falls within an Outer London Opportunity Area, the provision should be up to 0.5 spaces per home.

If almost 80% of the homes will not be able to have a car due to lack of parking provision, they will need good public transport and amenities close by. PTAL 2 means that public transport provision is poor (and happens to be very overcrowded at peak times), while the 15-minute neighbourhood table in Section 12 (Infrastructure) shows that many amenities are considerably further away than a 15-minute walk eg Osterley tube station, primary schools, GP surgery, post office, library, leisure centre/gym.

The table in Appendix O (pg 492) in the Transport Assessment shows parking provision in 11 developments around London with more than 50 dwellings and with PTAL between 1a and 3. The

average parking provision for those 11 developments is 1, so one car per dwelling, compared with 1 car per 5 dwellings in this location.

Just because there is little parking doesn't mean there will be a reduction in car journeys. Residents without cars may be picked up by colleagues to go their job location, creating a car journey involving an apparently carless resident. Lack of parking spaces does not mean residents will not have cars, as they may park in local side streets overnight, creating night-time parking problems for residents of those streets. They may drive to work if they have workplace parking, even if they could go just as easily by public transport, as this gets the car off the streets during the day when a CPZ operates. Residents without cars are likely to use taxis and Ubers on occasions, and order goods or take-aways to be delivered to their home, thus adding to the traffic.

The conclusion has to be that the parking allocation for this site with poor public transport and lack of nearby amenities is unacceptably low.

In addition to the 100 residential car parking spaces there would be 3 visitor spaces and 2 car club spaces, which is wholly inadequate.

#### **8.12. Tesco Staff & Customer Parking**

There will be no on-site parking for Tesco staff except for disabled staff, in contrast to the current store where staff parking is available. Significant numbers of Tesco staff work unsociable hours, when public transport is more limited. This could have a significant impact on those members of Tesco staff who currently drive to/from work.

As for shoppers, reduced-capacity multi-storey parking would discourage or exclude important categories of shoppers needing cars, such as families with children, older people, etc. Even the average shopper will find it difficult to deal with a weekly shop if parking spaces are limited or routinely unavailable.

#### **8.13. Car Club Numbers**

The number of car club bays across the 2 sites is proposed at 12; not exactly a huge number for 5-7K residents, and where less than one in four homes would have access to a parking space.

2 car club spaces on the current Homebase site for an estimated population of between 1.1-1.5K doesn't seem very much at all, and given that people are being increasingly encouraged to relinquish car ownership.

#### **8.14. Cycle Spaces**

3,250 cycle spaces across the 2 sites. How will they be split and managed to encourage owner-friendly use? What measures are proposed to stop bicycle theft? This detail is lacking in the planning application.

## 9. ENVIRONMENTAL ASPECTS (INCL. CLIMATE EMERGENCY)

### 9.1. Energy Statement

The targets for Zero Carbon and other energy saving measures are not sufficiently ambitious for a design conceived in 2020 \*, given the size and profile of the proposed development. The overall design boundaries have not been positively stretched, and no allowance has been made for Future Proofing, to further reduce Carbon emissions called for in the London Plan. The proposed design fails to achieve a true Zero Carbon, given that the resultant Residual Carbon emissions of **283 Tonnes CO<sup>2</sup>** per year, have to be mitigated by paying into a Carbon Offset Fund. This is applicable to the design of the buildings' fabric and the systems that serve them. In the current fast-changing energy climate, it is reasonable to expect the design proposals for a major new development not only to comply, but exceed the targets outlined in the applicable Energy Policies. Many commercial developments have aimed to achieve ambitious targets.

Comments below are made with reference to National, Regional and Local Policies and Regulations, with particular emphasis on the following two documents:

- The **draft London Plan**, which is a material consideration in planning decisions. The draft London Plan is at an advanced stage, and Policies contained in the **Intend to Publish (ItP) London Plan** issued in December 2019, carry a significant weight in Planning decisions.
- The **Climate Emergency** declared by the GLA and London Borough of Hounslow in December 2019, which make Sustainability a top priority, in relation to all other key issues.

#### 9.1.1. **Developers approach to Carbon Emission Reduction: (Note: the minimum ItP London Plan target for Carbon emission reduction is 35%)**

**Proposed concept:** A very modest **36%** Carbon emission reduction is declared in the Report. A site wide heat network is proposed to supply heat from air-source heat pumps and gas boilers, serving all residential units. This delivers a site wide CO<sup>2</sup> reduction of 18%, over the Regulations (Part L 2013 baseline). The combination of site-wide heat network and buildings' efficiency measures results in an estimated Regulated CO<sup>2</sup> emissions reduction of **36%** over the Regulations' Part L.

Although **36%** just meets the minimum energy requirements of **35%** stipulated in the ItP London Plan (Policy SI 2) and L B Hounslow Local Plan, it is not sufficiently ambitious in terms of Carbon Emission reductions.

The Report states that "No further renewable energy technologies are considered necessary to meet the minimum 35% onsite Carbon reduction policy target".

- **Climate Emergency Compliance:** The Report makes no reference to Climate Emergency, and there is no indication that specific measures were taken to ensure compliance.
- **Compliance with ItP London plan and Climate Emergency compliance:** The Plan stipulates that "all major new developments should be net Zero-Carbon, to reduce greenhouse gas emissions in operation, and minimise both annual and peak energy demand". **Payment into Carbon Offset Funds should be the very last resort**, if it can be clearly demonstrated that other options are not technically viable to further reduce Carbon Emissions. This requirement has not been fulfilled.

- Options for Zero Carbon (Residential):** There is no evidence of studies to thoroughly investigate options for reducing Carbon Emissions to achieve Net Zero Carbon, or to clearly demonstrate that this target could not be delivered.

Options were stated in the Report, but were dismissed without presenting verifiable feasibility studies.

**ItP London Plan:** “All developments to maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal) and use innovative building materials”
- Zero Carbon for Residential:** a notably *low 36%* is estimated towards achieving Zero Carbon. Whilst 35% is the minimum target allowed under the current Regulations, the estimated 36% is not sufficiently ambitious, to say the least, for a major new development submitted in 2020. The significant **64% shortfall in achieving Zero Carbon emissions**, is mitigated by the Developer **paying into L B Hounslow’s Carbon Offset Fund**.

Carbon Offset payment is meant to be adopted, only as the *very last resort*, if all other Carbon saving options have been thoroughly investigated and could not be implemented for robust, verifiable and convincing reasons. The developer’s approach completely undermines L B Hounslow’s pledge to be Carbon Neutral by 2030.
- Proposed Energy System for Residential:** It is noted that *no renewable energy sources are used* for heating. A site-wide heat network is proposed to serve the residential units, using “decentralised air-source heat pump and gas-fired boilers”. The heat pumps would generate heat with a SCOP (seasonal efficiency) of 2.81.

**Boilers will be operated using fossil fuel to cover the significant 64% shortfall in heating demand. Gas-fired boilers are therefore considered to have a “negative” contribution to achieving Net Zero Carbon.**

(Noted details from Report: Heat pumps pre-heat water from 30°C to 50°C in two stages, with gas boilers providing substantial temperature uplift up to 70°C).
- Zero Carbon for non-Residential:** the new London Plan’s guidance calls for achieving Zero Carbon for non-residential units. This is of significant importance, particularly in case of medium and large non-residential units. There is no evidence in the Report that this requirement has been considered or will be achieved in the future
- Use of Fossil Fuels & Greenhouse Gasses:** the proposed **gas-fired** boilers supply the 64% short fall in heating demand by using **fossil fuel** and hence add to, rather than curb, Greenhouse gases.

The significant consumption of fossil fuel and the resultant Carbon emissions are at variance with the words and the spirit of the London Plan and Climate Emergency.
- Renewable Energy Sources:** only 3 technologies were very briefly considered, but dismissed.

**Note: ItP London Plan 9.3.8:** “Development proposals should identify opportunities to maximise both secondary heat sources and renewable energy production on-site. This includes the use of solar photovoltaics, heat pumps and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind and hydropower-based renewable energy in some locations within London. Innovative low- and zero-carbon technologies will also be supported”.
- Feasibility Studies for Renewable Energy:** No feasibility studies were included in the report for exploiting renewable energy sources. These should include calculations, methods of implementation, capital and running costs etc. They should also include intangible benefits to

the users and the local community (e.g. health etc). Options considered are expected to be comprehensively investigated, clearly presented and verifiable.

- **Future Proofing:** No provisions are made to further reduce carbon emissions, as per London Plan {Ref. ItP London Plan: “by maximising opportunities to produce and use renewable energy on-site (e.g thermal storage technologies etc.)”}.

This issue is also important because the **Target Emission Rate (TER) will increase over a period of time, in order to achieve the Zero Carbon London ambition** and reflect the costs of more efficient construction methods, as intended in the future updates to the London Plan. The Report states “*Provision will be made for future connection to external heat networks*”. This approach is vague and involves many uncertainties including timing, availability, costs, with no verifiable facts or guarantees to achieve further savings in Carbon emissions.

- **Residual Carbon & Offset Funds:** it is noted that the estimated Residual Carbon Regulated amounts to **283 tonnes CO<sup>2</sup>** per annum, which is considered **very high** for all of the above reasons.

Noted also that excess in Carbon emissions is dealt with through the **more expedient approach of simply paying £509,400 into a Carbon Offset Fund** to the London Borough of Hounslow

\* Note: as far back as 2008, Zero Carbon was achieved at the large BedZed Residential development at L.B. Sutton. There are also other recent examples of Zero Carbon developments.

## 9.2. Sustainability Statement

The BREAAAM targets for a design submitted in 2020 are expected to deliver much higher scores. Many Sustainability measures included in the Report could be significantly improved, given the size and nature of the proposed new development. The approach adopted seems to indicate that the overall design has developed with fairly limited Sustainability ambitions, and has been short on adopting forward-looking measures. No allowance appears to have been made for Future Proofing. This is particularly applicable to the design of the buildings’ fabric, the systems that serve them, and more importantly on the well-being of occupants. In the current fast-changing Energy and Sustainability fields, and long timescale of the proposed development, it is reasonable to expect the design proposals not only to comply, but to exceed the targets outlined in the words and spirit of the Energy Policies. No justification is given for the demolition of the fully functioning current Homebase building given that the Circular Economy is at the forefront of Sustainability issues, particularly in the current economic climate.

Comments below are made with reference to National, Regional and Local Policies as well as applicable Regulations, including the following two documents:

- The **draft London Plan**, which is a material consideration in planning decisions. The draft London Plan is at an advanced stage, and Policies contained in the **Intend to Publish (ItP) London Plan** issued in December 2019, carry a significant weight in Planning decisions.
- The **Climate Emergency** declared by the GLA and London Borough of Hounslow in December 2019, which make Sustainability a top priority, in relation to all other key issues.

9.2.1. **Relevant Planning Policy: The Report makes reference to adhering to and considering the new London Plan requirements. Policies considered are listed as SI2, 3, 4, 5, 6, 13 & T5), but there is no clear evidence in the Report that is provided that they have been adhered to.**

### 9.2.2. BREEAM

**Residential:** Noted that a full BREEAM Pre-Assessment was undertaken. It is predicted to achieve 'Very Good' rating (at 65.6%), but falls short of 'Excellent' (at  $\geq 70\%$ ). (Note: \*\*Policy EQ2 "all developments over 500 sqm should be assessed against BREEAM standards and meet a rating of 'Excellent' as a minimum).

**Retail:** it is noted that the new Retail (Tesco) is predicted to achieve only a "BREEAM Very Good", in contrast with "Excellent" stipulated by Hounslow.

### 9.2.3. Circular Economy: a statement is included, but no information, or practical examples are provided about how it will be applied to good benefit.

**Existing Homebase building:** no study or justification is given as to why it cannot be retained, re-used or re-purposed, given that the building is currently being well used and appears in to be in good structural condition and functional working order. It is very popular with the local community and serves them well. It is also considered as a valuable working asset, particularly at a time when the economic climate and Sustainability issues are favouring and encouraging the Circular Economy.

### 9.2.4. Energy & CO2 Reduction:

**Residential Mechanical Ventilation:** residential units rely on energy-driven Mechanical Ventilation with heat recovery, rather than using Natural ventilation. The sustainable approach of using Natural Ventilation is expected to have been maximised, unless noise and pollution prevent this.

### 9.2.5. Water Reduction/Grey Water Recycling: no consideration was given to adopting the sustainable approach of recycling Greywater and using it to irrigate the extensive landscaped areas proposed for the development.

### 9.2.6. Sustainable Transport: the report states that "the site will benefit from a good existing public transport". This is very unlikely to be the case, as **public transport services are currently running to maximum capacity. There are significant uncertainties in funding and timescale to implement the necessary up-grading and improvements** to serve the additional number of people arising from the proposed new development. Refer to comments below on the Transport Assessment Report:

- **Future Proofing:** (ItP London Plan): No allowance has been made to facilitate the improvement of Sustainability targets, particularly in a fast-changing world of Environmental and technical standards. See item below.
- **Additional and Improved Environmental Standards:** It is reasonable to expect the Design Concept of buildings, for such a major new development, to take on board some, or all of the forward-looking and enhanced standards in the Building Industry. These include:
  - The "Home Quality Mark" standard.
  - The "WELL" standard for Multi Residential, and other places of work
  - The "Living Building Challenge" standard (flagship requirements).

Although the above Standards are not at present mandatory, they are becoming rapidly a benchmark for complying with the words and spirit of true Sustainability, not only for buildings, but for the wellbeing of people that occupy them.

9.2.7. **Local Ecology:** Current noise levels and air quality at this site indicate that three times the proposed additional planting of trees and shrubs at ground level would be essential to create a healthy space to live. The proposed plans include the planting of 41 trees and 121 shrubs, (many at podium level), having removed a mere 13 trees (currently in situ, but in poor condition). Recent local complaints of sewage smells, and The Times report on 29 October 2020 of overflows of sludge from Mogden sewage works into the Thames killing hundreds of fish, highlight the urgent need to ensure that such essential infrastructure is scaled up in advance of any further increases in population density to prevent further damage to wildlife.

9.2.8. **Environmental Impact of Tall Buildings:** The proposed tall buildings are environmentally unfriendly. Below are some of the reasons:

- **CO2 Emissions:** The extensive use of concrete and steel in tall buildings adds significantly to environmental harm, due to the high CO2 emissions involved in their production. The global production of cement, a key ingredient of concrete, produces 5% of the world's total CO2 emissions. The steel manufacturing process produces 3 tonnes of CO2 per tonne of product.
- **Local Environment:** Tall buildings create substantial shadows on adjacent homes, and infringe the privacy of residents nearby. Tall buildings have an adverse effect on environmental winds created at pedestrian and podium levels.
- **Energy Use:** Research into energy consumption in modern buildings has indicated that above 5 storeys, doubling the height of a building doubles the energy consumption when occupied and in use. The reliance on lifts is a practical and an environmental disadvantage. The use of lifts adds to the recurring running and maintenance costs. The energy consumed by lifts is significant and cannot be ignored. While the UK is still significantly dependent on fossil fuel, this inherent inefficiency of tall buildings further undermines efforts to reduce carbon emissions.

### 9.3. **Glare – Safety Risks and Discomfort (by Point 2 Surveyors Ltd)**

The curved façade of the tall Block A is both substantial and highly glazed, from ground level upwards. It would be a source of significant glare, which causes unnecessary safety risks and discomfort for people.

The glare study indicates that the primary source of glare is Block A, due to its substantially glazed façade combined with its dominant mass, height and its curved façade that inherently spread glare in a semi-circular field. Other blocks are less glazed but are nevertheless the source of some glare within the development. The glare diagrams produced highlight the main problem areas where people will be adversely affected by glare, including:

- **Cars, Ambulances and Lorry drivers:** users of the critical A4 / Syon Lane Junction. Also, drivers heading east on the A4 and those travelling on Syon Lane north and south. As well as drivers heading east from Northumberland Avenue.
- **Train Drivers:** the excessive height of Block A means areas that are further afield are also affected. This includes train drivers heading east on the South Western Railway line to Waterloo.

- **Residents:** glare will be a source of discomfort to the residents living in the 2-storey homes on Syon Lane/Northumberland Gardens.
- **Pedestrians and Cyclists:** in particular at Gillette Corner.
- **Residents within the proposed development:** glare will also occur from glazed facades in individual blocks, causing discomfort to residents within the development itself.

**Other adverse effects:** the highly glazed façade of the tall Block A, in particular, makes a negative contribution towards Zero Carbon and Climate Emergency, regardless of how thermally efficient its facade may be.

No mitigation measures have been proposed to reduce or eliminate glare.

Strategic mitigation measures which offer a substantial reduction of glare should have included:

- Substantial reduction of glazed areas and reflective façade elements, particularly in Block A.
- In addition to the above, reconsider modifying the curve-shaped façade of Block A. This is to reduce the inherent spread of glare of a curved façade into a wider field.
- A more radical reduction in glare could be achieved by uniformly reducing the height of the development. This approach is driven by other fundamental urban planning reasons, addressed elsewhere. It involves **reducing the development height to 6 storeys, to be in keeping with the area's character.**

#### 9.4. Wind Microclimate & Tall Buildings (Report by RWDI - Chapter 13)

The proposed development includes a number of tall buildings. Their presence has an adverse effect on the wind microclimate within and even outside the proposed development.

Wind Tunnel tests were conducted using a physical 3D Model of the development and the surrounding buildings. This is a recognised method for identifying wind turbulence created by tall buildings, and its effect on component buildings within the development and neighbouring buildings.

A Wind Tunnel Test was performed by RWDI in their laboratory, using a 1:300 scale model of the site and surrounding areas, on a 2.4m diameter rotating disc, including surrounding buildings within a 360m radius of the centre of the Site. Wind speed measurements within and around the development were performed using 'Irwin probes', which measure the mean and gust wind speeds at a full-scale height of 1.5m above the surface upon which the probe is located. Wind speeds were measured at up to 157 locations, with configurations for different wind directions in equal increments, with 0° representing wind blowing from the north and 90° wind from the east and so on.

Dealing with tall buildings involves compliance with Central and Local government Policy documents. Below are some of the applicable extracts from the Intend to Publish London Plan (ItP).

*Policy 7.7: "Tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation and telecommunication interference".*

*Policy D3: "Optimising site capacity through the design-led approach (Para 3.3.8), states that: "Buildings massing, scale and layout should complement the existing streetscape and surrounding area. Particular attention should be paid to the design of the parts of a building or public realm that people most frequently see or interact with in terms of its legibility, use, detailing, materials and*

*location of entrances, and creating a comfortable pedestrian environment with regard to levels of wind”.*

*Policy D8: “Public realm, Development Plans and development proposals, states that: “Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.” . “Ensure that appropriate shade, shelter, seating with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place.”*

*Policy D9: “Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.”*

#### 9.4.1. **Wind Tunnel Test Results**

The Wind Tunnel tests have identified the following main problem areas:

- **Ground floor:** In locations at the corner of development (particularly the north-east corner on Great West Rd) wind speed would exceed the 15m/s safety threshold for more than 2.2 hours per year. This would be a safety concern for cyclists and more vulnerable pedestrians.
- **Podium and roof-terrace amenity areas:** Eight locations in those landscaped areas would experience summer wind conditions that are two categories windier than suitable for their intended use. Wind mitigation measures are essential to make these areas safe for people’s intended use. Windier conditions will be expected outside the summer months.

*The Wind Report states: “Large upper level terraces and large amenity spaces are assessed on the basis that they are intended for good-weather use only. A mix of sitting and standing conditions during the summer would be acceptable provided that any desired seating areas are situated in areas having sitting use wind conditions that occur during the winter season usually mean that the area would be classified as sui table for standing in the windiest season, unless additional shelter was provided,”*

The restricted use of roof-terraces quoted in the Wind Report is a cause for concern as stated below. Please see detailed comments under ‘Issues of Concern’ below.

- **Thoroughfares:** Areas around the corners of the development would be one category windier than suitable for thoroughfare use.
- **Entrances to the Development:** Areas located on the north, northern corners and south-western corner are one category windier than suitable for entrance use.
- **Block B2 Balconies:** the stack of balconies at the north-west elevation suffers from adverse wind conditions.
- **Bus Stop and Railway Station:** these areas would be windier than conditions suitable for their intended use.

#### 9.4.2. Wind Mitigation Measures Proposed

- Mitigation measures include balustrades to most roof terraces and canopies to roof terrace of Block A. Four trees at podium level between Blocks A and B. A balustrade to the northern edge along with five vertical screens with trees between them. A canopy at the entrance to Tesco with trees and screen to trolley stand. Draught lobbies to windy entrances. Mitigation measures to some thoroughfares with two requiring further measures.
- In the case of roof-terrace amenity areas, it is noted that mitigation measures would be suitable for their intended use, but only during the summer season. This restriction is a cause for concern as stated below.

#### 9.4.3. Unresolved Wind Mitigation Measures

The following locations will be subject to adverse wind conditions and need resolution.

- Ground floor (Probe location 45)
- Thoroughfares (Probe locations 59 and 62)
- Balconies (Probe location 171)
- Bus Stop and Railway Station (Probe 66)

**It is not evident what wind mitigation measures would be possible and effective in resolving the above problems. There is no certainty therefore as to whether they can be practically implemented and integrated into the overall design of the development and applied to the nearby affected areas beyond the project.**

##### **Issues of Concern:**

- It is noted that the roof-terrace amenity areas will experience windier conditions outside the summer months. No mitigation measures are proposed to extend their use by flat-dwellers, given the extensive landscaping of the roof terraces. The overall environmental conditions for the roof-terrace amenity areas are of great concern. This is due to the combined effect of wind and self-shading, which is very likely to render such areas unsuitable for their intended use. This is considered to be a significant issue, as the scheme features extensive high-level landscaped areas, designed with the aim of providing pleasant external areas.

The restricted use is a serious disadvantage for the flat-dwellers, given the fact that Central and Local Governments are encouraging people to make maximum use of outdoor spaces for leisure and exercise, particularly after the advent of COVID-19.

- Some important wind mitigating measures are outstanding, with no certainty they can be satisfactorily resolved by all concerned.
- No account appears to have been taken of the 6-storey "Access Storage" building under construction at Gillette Corner on the site of the former Syon Gate Service station.
- It is not evident whether Wind Engineering advice was given to the design team and developer to substantially resolve wind turbulence problems in the first place.

This might have included exploring or adopting radical parametric drivers, such as height, location and massing of residential blocks.

- There is no evidence that the results of the Wind Tunnel tests were communicated and acted upon by the relevant design team members to address the overall micro climate design of the roof-terraces, including all mitigation measures. The combined Wind Tunnel and sunlight studies should have informed the design of the roof-terraces. A case in point is the self-shading effect of the roof-terraces from adjacent residential blocks within the development.

9.4.4. **Note on Implementation of Mitigation Measures and Responsibilities:**

It is not clear from the developer's reports and other documents, who will be responsible for measuring and monitoring that the Wind microclimate criteria have been met, once the project is completed. Also, who will be responsible for undertaking and financing any remedial measures necessary in case of non-compliance. This is an important issue to resolve, as remedial work may be time consuming and costly, given that it may involve re-testing in the Wind Tunnel and implementing additional mitigation measures.

**Wind Tunnel tests** must be superimposed on those obtained from the **Sunlight studies**, to clearly identify the extent to which roof terrace would be suited for their intended use.

## 10. INFRASTRUCTURE

With the potential addition of an estimated 4.7-6.7K residents across the 2 sites, there is need for considerable additional infrastructure. Public transport is dealt with in Section 8.

### 10.1. Need for a GP Surgery

The nearest GP surgeries are some distance away and are struggling to cope with the increased populations from all the developments in Brentford (Brentford Health Centre, over a mile away to the east) and along the London Road on the border of Isleworth and Hounslow (Thornbury Road/Spring Grove practices over a mile away to the west). The developer is proposing a GP surgery at the current Tesco site, but it should be on the Homebase site for the following reasons:

- public transport is better at Gillette Corner (Syon Lane station, H91 bus, H28 bus) than on the current Tesco site where there is only one bus service (H28) which only runs every 20 minutes
  - there will be parking at the new Tesco store which could be used for the GP surgery
  - there appears to be no provision for parking at the GP surgery at the current Tesco site.
- A GP surgery is needed now so could be operational on the Homebase site by 2025-7, whereas on the Tesco site, the earliest it would be operational would be 2030.

### 10.2. Need for a Gym

We currently don't have a gym in the OWGRA area <https://owgra.org.uk/owgra-area/> or in Osterley & Spring Grove ward.

### 10.3. Need for a Public Swimming Pool

Our nearest swimming pools are all a drive away and difficult to get to by public transport: Brentford, Isleworth, Heston. Apart from being used by the general public, there are many secondary schools nearby which would benefit from having a swimming pool in the area (Nishkam, Bolder, Green School for Girls, Green School for Boys, Isleworth & Syon School). Parents of primary school children already have a waiting time of many months/years to sign their children up for swimming lessons in the nearby pools, and that is before the anticipated increase in population these developments would bring.

### 10.4. Need for a Hill!

London National Park City (<http://www.nationalparkcity.london/>) is promoting the building of hills for health and exercise purposes. Northala Fields (by the A40 near Target roundabout in Northolt), four man made hills in Northolt, built from the rubble from the rebuilding of Wembley, have proved very successful, and are very popular (<http://www.londongardenstrust.org/features/northala.htm>). Back in autumn 2019 we asked if the spoil from the demolition of Tesco and Homebase could be used to build a hill or two in our area eg along Windmill Lane (opposite Seccombe between the tube line and the Garden Centre), or in Boston Manor Park, or in Gunnersbury Park. We are very lacking in hills in this part of West London. The nearest ones to Osterley are Northala Fields and Richmond Park, both a drive away and difficult to get to by public transport. There was enthusiasm from the developer initially but has not been mentioned since 2019. Removal of the spoil from the demolition of the two sites to a distant landfill is not helpful to sustainable development and good use could be made of the spoil locally.

### 10.5. 15-minute Neighbourhood

Since the pandemic and increased levels of working from home, the concept of 15-minute neighbourhoods is becoming a laudable concept of life for cities in the future, where local facilities should be located within a **15-minute walk from home**. Unfortunately, the sites of the proposed developments do not fulfil the 15-minute rule in many instances as can be seen in the table below, and would require a journey by some means of transport in many instances.

**TABLE 3**

**Can you get to a library, post office, a park, a GP etc in just a 15-minute walk from current Tesco and Homebase sites?**

Type	Location	Homebase site (Syon Gardens)		Tesco site (Osterley Place)	
		Distance (miles)	Avg Walk time	Distance (miles)	Avg Walk time
Overground Train Stn	Syon Lane	0.2	3 mins	0.5	11 mins
Main Transport to Hounslow High St	Busch Corner	0.5	10 mins	0.8	17 mins
Underground Tube Stn	Osterley Tube Station	1.2	24 mins	1.0	19 mins
Nursery / Primary School	Marlborough Primary School	0.6	13 mins	1.0	20 mins
	Smallberry Green Primary School	0.7	15 mins	1.1	23 mins
	Isleworth Town Primary and Nursery Sch.	1.0	20 mins	1.1	24 mins
	Spring Grove Primary School	1.5	30 mins	1.6	33 mins
	Heston Primary School	2.3	45 mins	2.2	43 mins
	Westbrook Primary School (Heston)	2.4	48 mins	2.3	45 mins
Secondary School	Nishkam Junior and Secondary School	0.6	12 mins	0.3	6 mins
	Bolder Academy (MacFarlane Lane)	0.6	12 mins	0.3	5 mins
	Green School for Girls	0.4	9 mins	0.7	16 mins
	Green School for Boys	0.4	9 mins	0.7	16 mins
	Isleworth & Syon Boys School	0.9	18 mins	0.8	16 mins
Further Education	West Thames College	1.2	25 mins	1.4	28 mins
GP Surgery	Brentford Health Centre	1.0	21 mins	1.2	26 mins
	Argyle Isleworth Health Centre	1.2	25 mins	1.6	33 mins
	Thornbury Health Centre	1.3	27 mins	1.4	28 mins
	Spring Grove Medical Centre	1.3	27 mins	1.4	28 mins
Hospital	West Middlesex University Hospital	0.8	17 mins	1.1	24 mins
Park	Syon Park (London Road pedestrian gate)	0.5	11 mins	0.8	17 mins
	Boston Manor Park (canal footbridge)	0.6	14 mins	0.8	16 mins
	Jersey Gardens, Osterley	0.8	16 mins	0.7	14 mins
	St Johns Gardens, Isleworth	1.1	22 mins	1.4	28 mins
	Osterley Park (main gate)	1.1	22 mins	1.2	24 mins
Library	Osterley Library, St Mary's Crescent	1.0	19 mins	0.8	17 mins
	Brentford Library, Boston Manor Road	1.1	21 mins	1.2	24 mins
	Isleworth Library, Twickenham Road	1.3	27 mins	1.6	34 mins
Post Office	London Road, Brentford	0.6	13 mins	1.0	21 mins
	London Road, Isleworth	0.9	19 mins	1.1	22 mins
Bank	Nat West (London Road), Isleworth	1.0	20 mins	1.1	23 mins
Leisure Centre / Gym	Isleworth Leisure Centre, Twickenham Rd	1.3	27 mins	1.6	34 mins
	Fountain Leisure Centre, Brentford	2.2	44 mins	2.4	49 mins
	Heston Leisure Centre	2.5	50 mins	2.4	47 mins
Garden Centre	Osterley Garden Centre	0.9	19 mins	0.7	13 mins

Source: Google Maps

Avg: Average adult walking speed

## 11. LOCAL HERITAGE

London Plan Policy 7 seeks to ensure no harm to strategic views and should make positive contributions to landmark elements. Hounslow's Local Plan policy CC4 Heritage looks for new developments to preserve and enhance listed buildings' settings. These proposals hide the views of the Gillette Building and NatWest Bank building especially from much of Syon Lane south. The Gillette Building is an Art Deco style commercial building of 2 tall storeys above ground arranged in a rhythmic series of bays either side of a lofty brick tower with luminous clock faces on all four sides at the top and is a key reference point for many miles in all directions.

It is difficult not to see how the proposed Homebase development would not clash with and detract from the Gillette building directly opposite (see Figure 3).

FIGURE 3



Other listed buildings on GWR south side, the Syon Clinic and Adini buildings especially, would be overwhelmed by the development's overly tall presence.

OWGRA finds the arguments put forward by the developer to justify the heights, massing and design of the Homebase site quite tortuous and considers it misguided to argue a taller, bulkier and more dominant set of buildings would be appropriate in this setting.

A separate objection has been submitted by Paul Velluet (Chartered Architect) on the Urban Design and Conservation Aspects of the proposals.

## 12. EDUCATION

### 12.1. Provision of primary school places

Current official data (published by central and local government) shows that there is an insufficient number of local primary school places to meet the demand that will arise from the proposed development on the current Homebase site.

While there may be wider availability within the borough, the journeys generated by travelling farther (over 1 mile walking distance) would be carried out by unsustainable modes of traffic, like 'car/van', which would go against Hounslow Council's own commitments to reduce pollution across the borough and to become a Cleaner Greener Borough.

#### 12.1.1. Travel and transport

The data from the latest DfT National Travel Survey of 2019 shows that the main mode of travel to/from school for primary school children is the 'Car/van' when the primary school is located over 1 mile away from home, see Picture 1 below (*Source: Department for Transport, National Travel Survey, table NTS0614*).

The percentage of cars as mode of transport is:

- 18% when the school is located under 1 mile from home
- Between 71-87% when the school is located over 1 mile from home

TABLE 4

Department for Transport statistics <a href="#">National Travel Survey</a>					
Table NTS0614 Trips to school <sup>1</sup> by main mode, trip length and age: England, 2002 onwards					
Select year:	2019				
	Percentage				
	Aged 5-10 years				
Main mode	Under 1 mile	1 to 2 miles	2 to 5 miles	5 miles and over	All lengths
Walk	80	19	1	0	46
Bicycle	1	4	1	0	1
Car / van	18	71	87	73	47
Bus <sup>2</sup>	1	5	9	18	5
Other transport <sup>3</sup>	-	1	1	9	1
All modes	100	100	100	100	100
Unweighted sample size: trips	3,801	1,770	1,237	582	7,390

<sup>1</sup> Education trips of under 50 miles only.

Hounslow Council recognises the need to tackle problems associated with traffic around schools at drop-off and pick-up times, notably road safety concerns, poor air quality, and inconvenience to residents, and in recent years it has introduced 'School Streets' scheme to promote active and healthy communities by:

- Improving road safety for pupils, residents and visitors to the borough
- Reducing pollution in the area, including particulates, which especially impact young people

- Increasing walking, cycling and active lifestyles for pupils and their parents and guardians
- Minimising anti-social behaviour arising from inconsiderate parking and dangerous manoeuvres

(Source: [https://www.hounslow.gov.uk/info/20053/transport/2157/school\\_streets](https://www.hounslow.gov.uk/info/20053/transport/2157/school_streets)).

If we look at the closest primary schools located within 1 mile (as a crow flies) of the proposed development on the current Homebase site, there are eight schools, four of which are under 1 mile walking distance.

See Table 5 below, schools listed in order of walking proximity:

**TABLE 5**

Proximity	Name of school	Walking distance from the Homebase site (TW7 5QE)
1	Nishkam School West London (TW7 5PN)	0.6 mile
2	Marlborough Primary School (TW7 5XA)	0.6 mile
3	The Smallberry Green Primary School (TW7 5BF)	0.7 mile
4	Isleworth Town Primary School (TW7 6AB)	0.9 mile
5	Our Lady and St John's RC Primary School (TW8 9FJ)	1 mile
6	St Mary's RC Primary School	1.2 miles
7	The Blue School CE Primary	1.2 miles
8	St. Paul's CE Primary School	1.2 miles

#### 12.1.2. Travel Issues with the Closest Five Schools

The data from the Hounslow Council website on existing School Streets schemes shows that schools 1-4 and 8 are all already affected by impact of motor vehicles and subsequent nuisance to residents.

**TABLE 6**

1	Nishkam School West London	A pilot School Streets scheme was introduced in September 2018 at the new site of Nishkam School West London. Restrictions for this scheme were the first to include both resident-only access in multiple roads and red route controls along Syon Lane. The scheme expanded in September 2020 to include Leigham Drive and the Great West Road slip road following community engagement.
2	Marlborough Primary School	Marlborough Primary / Smallberry Green / Green School for Girls - A new School Streets zone in Isleworth will be implemented in October 2020 to manage the impact of motor vehicles on London Road (red route controls) and nearby cul-de-sacs (resident access only on Darcy Road, Finney Lane, Holderness Road, Blenheim Way, Jodrell Close, Turnpike Way and Old Pound Close).
3	The Smallberry Green Primary School	

4	Isleworth Town Primary School	Isleworth Town Primary School - Experimental scheme with resident access only restriction on nearby roads (Smallberry Avenue, Mandeville Road, a section of Linkfield Rd, Townfield Way and roads branching from it)
8	St. Paul's CE Primary School	Measures have been introduced on Albany Road from the access into Watermans Court to the end of the cul-de-sac (junction with Alexandra Road).

### 12.1.3. Primary School Places Available

The data from the Hounslow Council website on 'How primary places were offered in September 2020' shows that all the five closest school are oversubscribed, that is receiving more applications than there are places available.

These findings are reported in Table 7 below:

TABLE 7

Schools under 1-mile walking distance		
	Places available	Applications received
<b>Nishkam School West London (identified by LBH admissions as Faith School)</b>	108	269
<b>Marlborough Primary School</b>	90	281
<b>The Smallberry Green Primary School</b>	60	191
<b>Isleworth Town Primary School</b>	120	327
Schools 1-mile or over 1-mile walking distance		
	Places available	Applications received
<b>Our Lady and St John's RC Primary School (identified by LBH admissions as Faith School)</b>	30	94
<b>St Mary's RC Primary School (identified by LBH admissions as Faith School)</b>	60	165
<b>The Blue School CE Primary (identified by LBH admissions as Faith School)</b>	60	226
<b>St. Paul's CE Primary School (identified by LBH admissions as Faith School)</b>	60	105

### 12.1.4. Legal Aspects

**The need for school places in Hounslow, based on the Local Plan 2015-2030, was successfully argued by the Council in Stryjak v London Borough of Hounslow & Ors [2016]:**

32. ... the identified and known need for school places both in the borough as a whole and in the local area, and the retention of much of the site as open space, it is considered that very special circumstances had been adequately demonstrated to justify the proposed development.

48. ...Of course, that equally underlines the importance of ensuring that there is sufficient choice of school places available to meet existing needs. There is no doubt that there is an existing need at present in the borough.

The judgement refers to the Officer’s report on the planning application P/2015/2516, to build the Nishkam School West London, the findings of which were accepted as proving an unfulfilled need for school places in the area and in the borough, according to the pupil projections over the Local Plan 2015-30.

Relevant excerpts of the officer’s report as follows:

“Local need for school places

7.19 The rise in population as evidenced through the latest calculations of population figures that were stated in the revised London Plan published earlier this year indicates that there is a clear and urgent requirement to increase school place capacity. Due to the predicted rise in population, this will put extra pressure on primary and secondary school provision.

7.20 There is a London-wide challenge of population and school population growth that is particularly acute in this Borough. Through work between the Borough and the GLA, forecasts predict a need for 24% increase in primary places between 2012 and 2017 and for an additional 28 forms of entry (FE) of secondary provision by 2019.

Pupil projections over the Local Plan 2015-30 can be seen below in Figure 6.

FIGURE 4



7.32 With the Government’s current approach to school place planning, it is clear that provision for new education facilities cannot be met in a timely manner on the allocated sites identified in the adopted Local Plan alone, as highlighted in the Local Plan Submission 2015-2030 Education Topic Paper to the Local Plan examination, and so other policies of the Plan support new school uses on other sites where this is necessary to meet need. This is further emphasised as a result of the demise of the Government’s Building School’s for the Future programme in 2010, which has restricted the provision of new school provision and added to the shortage of school

places. As a result of these pressures and the designation of the site as MOL, in order to justify the 'very special circumstances' required for development on MOL, a sequential site assessment was undertaken to establish whether the proposed development site was the most suitable, available and achievable for the delivery of an 'all-through' school of the size sought."

The dire need of school places in the area contributed to demonstrate the **Very Special Circumstances** to build on Green Belt/Metropolitan Open Land. If the Council were now to approve a development which it knows will create further substantial demand on an already struggling school system, then it will have acted in a negligent way and further undermined the protection of the remaining Green Belt/Metropolitan Open Land in the area, by opening the prospects for further unsustainable school development.

#### **12.2. Provision of Secondary School Places**

It would appear that provision of secondary school places would be sufficient to cope with the increased population, particularly as there are numerous secondary schools close to the proposed developments, which would admit children based on proximity criterion in the event of oversubscription.

## 13. LANDSCAPING & AMENITY SPACE

[See draft London Plan policy D1B, standard 28 of Housing SPG, LBH Local Plan policies SC4 scale and density of new housing development, SC5 ensuring suitable internal and external space and GB9 play space, outdoor sports facilities and burial space, and BRE Guidelines.]

There is insufficient outdoor communal amenity space even with the publicly accessible outdoor space at ground level; the all-purpose podium gardens, not just for pleasure and play but also with pathways to connect all the separate blocks. This would create a considerable amount of traffic. OWGRA has concerns about more active older children (5-11 year olds) engaging in ball games, cycling, etc. What sort of supervision will there be? How would the age of the children be monitored? We could not find the height of the parapets along the Syon Lane frontage, and have concerns for children's safety and the height of the parapets.

### 13.1. Private Amenity Space

For flats appears generally acceptable in terms of area given the provision of standard-sized balconies. However, these amenity areas will experience windier conditions outside the summer months. Their use by flat-dwellers will be curtailed due to the combined effect of wind and self-shading, thus rendering such areas unsuitable for their intended use during other months.

### 13.2. Public Amenity Space

This is mainly provided on podium and rooftops, not at ground level. There is adequate minimum space for the estimated 1,100-1,500 new residents. 'The proposed development delivers 4,928sqm of podium gardens and 2,716sqm of public accessible streetscape' (Planning report para 15.1.45). This is lower than required by LBH Local Plan policy SC5 but 'some flexibility can be applied'. OWGRA considers this to be unacceptable given the estimated number of residents at up to 1,500 initially 'and highly likely to increase in the long term' (Planning Statement para 16.1.3), providing only an average of 6sqm per person. It is 20% below requirements and therefore not compliant with Local Plan policy SC5. We can only hope that not all residents will want to be outdoors at the same time. The developer seeks to soften the impact of this underprovision by pointing to other developments in Hounslow which do not meet the minimum standards. This sort of arguing by precedent is not a valid consideration in planning.

'Child yield' is estimated at 237 requiring 2,370sqm play space. There is no locally available play space within 400m of the site for children aged 11 and under. Older children have access further afield. Play space provided on-site is 1,096sqm and may be in breach of Local Plan policy GB9.

The restricted use of amenity areas is driven by adverse microclimate conditions as explained elsewhere in this document. This is a serious disadvantage for flat-dwellers, given the fact that Central and Local Governments are encouraging people to make maximum use of outdoor space for leisure and exercise, particularly after the advent of COVID-19.

### 13.3. Effect on Daylight and Sunlight for Proposed Homes

Planning guidance for privacy provides for achieving visual separation at a minimum distance of 18-21m between facing homes but the Housing SPG says these need not be adhered to in city sites. However, this is not a city site, it is surrounded on three sides by suburban housing.

Further, within the site itself, the developer acknowledges the distance between individual blocks B1 and A1, B1 and E2 and A1 and E2 of a minimum of 18m 'is not quite achieved' such that the design has had to be changed to 'avoid compromising privacy, daylight and sunlight'.

OWGRA also notes that many of the flats are designed to use 'light and ventilation' from front doors from internal corridors in the blocks of flats to avoid being described as 'single aspect', often facing northeast or northwest. This would provide poor living conditions for future residents, contrary to Local Plan policy SC4 (scale and density of new housing development) as would the relatively low levels of daylight and sunlight experienced by only 55% of habitable rooms within the development (Planning Statement p 73). OWGRA notes that the developers state that 'if the number of north-facing flats were reduced, it is likely that more massing would have to go on the southern boundaries of the site. This would have a much larger effect upon the neighbouring properties opposite as well as the views of the listed Gillette Building plus potentially significantly reduce the level of sunlight on the podium garden which currently is designed to have '2 hours of sunlight at the Spring Equinox'. In these circumstances the development is not sustainable and therefore fails to comply with Local Plan policy SC1 (sustainable mixed communities).

A further current consideration is that people in airless flats want to move to the suburbs with gardens, while those who no longer need to go to their offices more than once a week want to move from suburbia to the countryside or small towns that offer a safer quality of life. The high-rise block may no longer be commercially viable.

## 14. FIRE STRATEGY

All proposed residential blocks feature a single staircase. Following the Grenfell Tower fire tragedy, two staircases have been recommended by RIBA (Royal Institute of British Architects). This has not been taken on board.

The Fire Strategy report outlines the applicable Regulations and provides some recommendations and guidance for achieving compliance with the Fire Engineering Codes and Regulations. The report identifies areas that are Code Compliant, and others that are not. Recommendations are made and some solutions are proposed, but no information or drawings are provided by the design team to confirm that all parts of the proposed development will be Code Compliant. The extent and nature of unresolved issues within the design team are not generally compatible with information expected at the Detailed Planning stage. No clear responsibility lines appear to have been established and agreed with the developer and relevant team members, regarding the façade design and construction. This is of particular importance, given the National focus on this critical topic. (e.g. Grenfell Tower and other similar buildings).

### 14.1. Fire Safety during Construction (2.3)

The report does not address fire safety issues during construction, but states that contractor should comply with relevant guidance documents. However, no evidence of this appears to be included in the submitted Construction Logistics Plan.

### 14.2. Fire Brigade Evacuation Alert System (4.1.4)

The report state that Fire Brigade Evacuation Alert System should be installed. This should be discussed and agreed with L. B. Hounslow, and if accepted covered by a clear and strictly monitored Planning condition.

### 14.3. Tesco Car Park Alarm System (4.1.5)

The system must be developed to deal with people who are not Tesco customers or staff. It is not clear who will be responsible to design and implement this, particularly that this system and all related issues need to be discussed and agreed with all affected parties at the earliest possible stage.

### 14.4. Residential Means of Escape, Apartment Layouts (5.0)

The report provides guidance and recommendations. However, it does not state that compliance with the Fire Strategy, Codes and Regulations is achievable or will be achieved. This is a source of concern, given that the architectural layouts (Table 1 in report) contain reasonable information to allow the design dialogue on Fire Code Compliance to be satisfactorily concluded at the earliest possible stage.

### 14.5. Apartments in “dead-end” Locations at Levels s 01-03 (6.3.3.2)

It is noted that some apartments are located in “dead-end” portions of corridors, at a significant distance from smoke ventilation shafts. This arrangement is not Code Compliant, and needs to be satisfactorily resolved. Fire engineering solutions need to be fully integrated into the architectural drawings to achieve Code Compliance.

#### **14.6. Fire Escape Travel Distances**

It is noted that many travel distances to fire escape stairs are not Code Compliant. Proposals are made to introduce additional mechanical smoke ventilation shafts in corridors. The proposed solution needs to be fully integrated into the architectural drawings to achieve Code Compliance.

#### **14.7. Residential Hub (6.4.3)**

This area does not comply with Fire Regulations. It needs to be satisfactorily resolved. Fire engineering solutions need to be fully integrated in the architectural drawings to achieve Code Compliance.

#### **14.8. Internal Fire Spread for Walls (7:B2)**

Recommendations are made but no information or drawings are provided to confirm that scheme is Code Compliant.

#### **14.9. Internal Fire Spread for Structure (8:B)**

Recommendations are made but no information or drawings are provided to confirm that the scheme is Code Compliant.

#### **14.10. External Fire Spread (9.0)**

Recommendations are made but no information or drawings are provided to confirm that scheme is Code Compliant.

#### **14.11. Façade Fire Aspects**

It is noted that "Fire Spread Calculations are currently unavailable, pending façade design". Given the national focus on this very critical topic (e.g. Grenfell Tower and other similar buildings), it is critical that the façade's design and construction issues are satisfactorily resolved at the earliest possible opportunity. This process should take place in conjunction with establishing and agreeing very clear lines of responsibilities for all parties concerned.

#### **14.12. Access & Facilities for Fire Services**

Recommendations are made but no information or drawings are provided to confirm that the scheme is Code Compliant.

#### **14.13. Basement Smoke Ventilation**

Recommendations are made but no information or drawings are provided to confirm that the scheme is Code Compliant.