

**HOMEBASE & TESCO, SYON LANE, CALL-IN INQUIRY  
APP/F5540/V/21/3287726 & APP/F5540/V/21/3287727**

**Dates of inquiry:**

**15, 16, 17, 18, 24, 25, 28, 29 & 30 March, 25 April, 26, 27, 28, 29 & 30 September 2022**

**Closing Statement: OWGRA (Osterley & Wyke Green Residents' Association), Rule 6 Party**

**INTRODUCTION** (Barbara Stryjak)

1. The Osterley & Wyke Green Residents' Association (OWGRA) thanks the previous Secretary of State for calling in this planning application and asks the new Secretary of State to consider our concerns regarding the proposed Tesco and Homebase developments. We would also like to thank the Inspector for her patience and the support she has provided during the course of the inquiry.
2. Having followed the inquiry carefully we are of the view that our major concerns have not received an adequate response from either the Council or the Applicant.
3. Our Ward Councillors and our London Assembly Member have all unequivocally objected to the proposals and spoke on the first day of the inquiry as did two heritage experts, Paul Velluet and Dr Sarah Rutherford, and also Keith Garner on behalf of Kew Gardens. Local residents and young mothers, Mandy Donaldson and Monika Ulan, spoke about the problems of frequently not being able to get on local buses with their children in buggies as buses are full, and about the already severely stretched other parts of infrastructure like GP surgeries, nurseries and playgrounds. Mrs Ulan contacted us at the end of March to say that the waiting list for swimming lessons at Isleworth Baths for her 6-year-old son is 480 children! And she can't even get through to them on the phone to see where he is on the waiting list now, but has to go down there personally to check! Her 11-year-old son needed to see a dentist this summer, and she couldn't get him to see an NHS dentist anywhere locally, and couldn't afford a private dentist; thankfully she was going to Poland during the holidays so managed to get treatment for him there.
4. Paul Engers presented the results of a survey he conducted among the residents of Oaklands Ave, who have concerns about traffic, overshadowing (particularly at the southern end of Oaklands Ave) and air pollution during 10 years of construction. George Andraos of the Wyke Estate spoke about the community spirit on that estate consisting of 179 houses and flats on an area roughly half the size of the combined area of the Tesco and Homebase sites, yet containing less than one twelfth the homes proposed across those two sites. It is one illustration among many of the incompatibility of these developments with the local built environment on the grounds of their scale and density. He also spoke of the inability of local infrastructure to support such huge developments. Tony Firkins of the Green Party expressed concern over environmental matters and the scant attention paid to the Climate Emergency.

5. We strongly dispute the assertion from the Applicant in their opening statement that *“There is agreed to be (subject in some instances to contributions to be delivered through s.106 obligation) sufficient underpinning infrastructure to enable the schemes to function well without detrimentally affecting the wider context in terms of public transport, education, leisure, healthcare, emergency services or water supply”* (ID 2.1).
6. OWGRA’s original concerns and objections were set out in our letter dated 20<sup>th</sup> September 2021 to the Secretary of State for Housing, Communities and Local Government. It is also very significant that many of OWGRA’s concerns were echoed separately by the Council’s own body, the Hounslow independent Design Review Panel.
7. OWGRA believes that a fundamental problem has been created by the Applicant’s and Council’s drive to maximise the number of flats on the two sites, regardless of their impact and effect on both the surroundings and the quality of life of future residents.
8. The twin crises of the pandemic and summer heat wave emphasise our points that inadequate space to cope with increased home working, and poor ventilation need to be given much more recognition; it is our view that this has not been the case during the course of this Inquiry from the Applicant and the Council. All informed opinion suggests that we can expect more pandemics and heatwaves in the future.
9. In our Opening Statement we said that we have never opposed development on these sites. We said that redevelopment must provide housing that fits in with the area’s residential character and heritage, and also meets Hounslow’s known housing needs. Residents should be guaranteed access to adequate public transport and the necessary local infrastructure and utilities, as required by planning guidelines and vital to a healthy and happy existence.
10. During the Inquiry the Applicant has tried to get more support for these schemes, but we heard of people being approached who were very opposed to these schemes and in one instance a letter of support was supposedly sent by someone who had never agreed to that happening. There was also the Applicant’s Facebook page seeking support for the proposed developments, but most of the comments on there were negative. We would like to remind the Inspector that Hounslow Council received over 800 letters of objection to the applications, in contrast to fewer than 30 letters of support. There can be no doubt that the proposed developments are overwhelmingly opposed by local residents.
11. After the planning applications were approved by Hounslow and before they were referred to the Mayor of London, OWGRA started a petition, opposing the developments and requesting the Mayor of London, and later the Secretary of State, to overturn the decision. In less than 3 weeks, we collected almost 4.5K signatures.
12. We need to emphasise that we expressed our many concerns to the Applicant during the consultation process yet most of these concerns were, and continue to be, ignored.

Despite our repeated requests for a 3D model the Applicant failed to display one and as a result, OWGRA commissioned a 3D model from a professional model maker. On the penultimate day of the Inquiry, the Applicant questioned the accuracy of the model but could not substantiate their criticism. OWGRA replied to the Applicant's questions about the model on 20 March 2022, but received no further correspondence from the Applicant.

13. During the consultation we asked on numerous occasions to be present during meetings with TfL to convey our concerns about transport and traffic, but nothing happened. So we were very surprised when the Applicant said in their opening statement that *"the evidence in this case shows the lengths to which the concerns of local people have been recognised and taken into account"* (ID 2.1) – nothing could be further from the truth!
14. Even requests made during the Inquiry have been brushed aside. For example, a condition that we requested, should the development be approved, is a trolley management system for the new store, as we are seeing a growing problem of discarded trolleys from the current Tesco Extra in our area. We've asked for lighting at Syon Lane station. Both requests have been ignored.
15. The Secretary of State's five principles from spring of this year were said to be at the heart of the new approach to housing, namely *'Beauty, Infrastructure, Democratic control, Environmental enhancement and Neighbourhood protection'*. He stated that *"... they can ensure that we have the right homes in the right places where people welcome them. Local people will be partners in making the places they love better and more beautiful, not pawns in a speculative game."*

#### **Turning to the Inquiry evidence:**

My colleague Olga Szokalska will now speak about Character & Appearance.

#### **CHARACTER & APPEARANCE (Olga Szokalska)**

16. The proposed developments on both sites must respect the local context, including its historic heritage. They should also be sensitive in scale to the surrounding built environment.
17. OWGRA maintains that the bulk and height of 16 tower blocks (up to 17-storeys) on the two sites would be in stark negative contrast with the character of the surrounding area. They would dwarf and dominate the historic and residential buildings nearby. As clearly illustrated in the TVIAs from MS Environmental and OWGRA's 3D model, they would give rise to a negative impact on the character and context of the area.
18. We want to stress that there have been no changes of any substance to the pre-application design to the height and bulk of the buildings, which could have helped to address local concerns. Significantly, neither site is identified for tall buildings in the

Hounslow Local Plan. Despite this, the Applicant wishes this lack of identification to be given “*limited weight*”. The Inquiry heard evidence that the fundamental concerns, expressed in the 2<sup>nd</sup> and final Design Review Panel report (CD 3.12), were not addressed, contrary to London Plan policy D4 (CD 6.2.27).

19. During the roundtable discussion on Character and Appearance on the penultimate day of the Inquiry, OWGRA presented a density comparison table of recent developments in the borough (ID 1.14.20). These are on similar suburban sites to Tesco and Homebase with low PTAL rather than the more employment-led higher PTAL rated sites of Citroen and other similar developments in Brentford quoted by the Applicant. The high density of 314 homes/ha proposed for the Tesco and Homebase sites, compared to 17 homes/ha in Osterley & Spring Grove ward, and 53 homes/ha on the Wyke Estate, diagonally opposite the current Tesco site, would make for an extreme and unacceptable step change in comparison with most of the surrounding built environment.

### **Protecting Heritage**

20. Council Officers, the Council’s heritage consultant (Mr Froneman) and the heritage consultant for the Applicant (Dr Miele) recognised that the proposals would result in a degree of harm to the setting of a number of designated heritage assets (the Royal Botanical Gardens at Kew, Syon Park and Osterley Park, as well as other heritage assets, including designated Conservation Areas and Grade II listed buildings). However, the Inquiry heard from Mr Roberts, that the Applicant did not explore an alternative scheme to avoid harm to the heritage assets, as required in London Plan policy D9 (CD 6.2).
21. On days 10 and 13, the Inquiry heard how the Council’s position changed from one of “less than substantial harm” to a number of heritage assets to recognising “no harm” at all.
22. We heard from Mr Patel, the architect of the Homebase site, that despite the concerns of the DRP about the impact of the development on Syon Park, the design team increased the height of the tallest towers (from 16 to 17 storeys on building B1 from 14 to 15 storeys on buildings B2-B3 and from 11 to 12 storeys on building A).
23. Mr Roberts acknowledged, during cross examination on day 10, that the proposed heights do not accord with the emerging Local Plan (CD 10.39).
24. The witness for the Council, Mr Smith, acknowledged that the proposals are in partial conflict with Local Plan policy CC3 (CD 6.1.13), which requires the Council to identify sites for tall buildings. The Local Plan does not envisage tall building away from the Golden Mile frontage and as such, the Tesco scheme is in conflict with the Policy.

25. It was put to Mr Smith, that the proposals exceed the appropriate heights, as defined in the GWC Masterplan (CD 10.39). Mr Smith argued that the building heights, defined in the GWC Masterplan and in GWC View Assessment (CD 10.40) were only *“indicative heights”*, subject to view testing.
26. It was put to Mr Smith that the Council has already identified development capacity for the GWC Opportunity Area to provide 7,500 homes (CD 10.39). The Council has identified that 8,287 homes can be built in the GWC using the **minimum site allocations**. Therefore, there is no need to exceed the appropriate heights for the sites to meet London Plan GWC Opportunity Area housing targets (CD 7.2.2). Mr Smith stated *“Yes, I think that this information shows, that there is a way of delivering the minimum requirement of 7,500 homes at lower heights”*. London Plan Policy D9 requires Boroughs to identify suitable locations for tall buildings and *“determine the maximum height that could be acceptable”* (CD 6.2).
27. The Applicant acknowledged that there is a *“degree of conflict”* with policy D9 of the London Plan (ID 1.7.2), as neither site is identified for tall buildings within the adopted Hounslow Local Plan. The Applicant claimed this conflict is reduced, as the sites are identified for development in the Emerging Development Plan (CD 7.1.1, CD 7.1.2, CD 7.2).
28. However, only the Tesco site has been identified for a possible cluster of **mid-rise buildings** in the emerging plan (CD 10.39). Mr Roberts acknowledged the Homebase site was not identified for a cluster of tall buildings.
29. OWGRA maintains that a smaller scheme, at lower heights and density would enable the developments to sit in harmony with the surrounding built environment and avoid harm to the heritage assets. The independent Hounslow Design Review Panel came to the same conclusion (ID 1.14.22).
30. For details of heritage evidence, we defer to the Closing Statement of Historic England.

#### **Homebase site proposals (full application)**

31. In their proof (ID 1.5.2), the Applicant claimed full compliance with Local Plan Policy CC1 (CD 6.1.11) which requires developments to respond appropriately to the context and character of the sites and Policy CC3 (CD 6.1.13) on tall buildings.
32. Mr Pankaj Patel, architect of the Homebase site, accepted in cross examination on day 2, that there was an abrupt change in scale from building B to the neighbouring commercial buildings to the east of the GWR, and that the proposals do not reconcile any change of scale between the industrial and residential areas. He agreed, that building B1 does not need to act as a gateway building, as the Gillette building and tower already perform this function.

33. The architect claimed the aim of the scheme's design was to celebrate the significance of the Grade II Listed Gillette Building (CD 1.5.2). In reality, the Homebase and Tesco developments in combination, would undermine the landmark role of the Gillette building.
34. It was put to Mr Patel that there was no positive design rationale to locate a 10-storey building C opposite 2-storey residential homes to the east, that there was no design rationale for such an extreme change in scale. Mr Patel had no answer to this.
35. Mr Patel conceded that there are no buildings of a similar scale in the vicinity of the application site. When discussing the Emerging Context (ID 1.5) Mr Patel referred to the Albany Riverside and Citroen developments. However, neither of these are within the vicinity of the Homebase site.
36. Mr Patel claimed there are plans for other high buildings immediately to the east of the site. Yet he was unable to produce any evidence for this. In fact there are no plans for tall buildings in the southern section of the Great West Corridor in the Emerging Plan (CD 10.39).
37. In conclusion, the Applicant is unable to demonstrate compliance with Local Plan policies CC1, CC3.

#### **Design Review Panel (DRP) position on the Homebase scheme (CD 3.12)**

38. The Inquiry was told the DRP process is an important one. This importance is emphasised in London Plan policy D4 (CD 6.2.27), which requires schemes to consider and address DRP recommendations. The Inquiry was told, that during the final assessment, the DRP still had **fundamental concerns** about the scheme. The DRP recognised, that although the Applicant had made some changes ***“the design evolution has focused on mitigating these issues, rather than solving them. Ultimately, we still believe that the brief to accommodate a Tesco Superstore of equivalent size to the existing, located on the opposite side of the road, on this site, has made it virtually impossible for you to achieve a scheme of the quality that you and Hounslow are aiming to achieve here.”***
39. There is no evidence that the Applicant addressed these concerns.
40. The DRP found the public realm is constrained to the edges of the site and there is not sufficient space to accommodate the movements of 1200 new residents and people walking to and from Syon Lane station. The 7 and 10-storey blocks fronting Syon Lane appear too crowded together, resulting in a lack of adequate space for residents to take full advantage of the podium gardens.
41. The DRP found there is too much development above the podium. The cramped conditions between the built elements do not provide the space to dwell. The site is

exposed to high levels of aircraft and traffic noise and air pollution. OWGRA agrees with the DRP, that open spaces on the podium will be unusable for most of the year, due to adverse environmental conditions (ID 1.14.22).

### **Tesco site proposals (outline application)**

42. **Heart of Osterley:** With 81% of the proposed new 1677 homes being studio and 1 and 2-bed flats, it is difficult to see, how the development would become a 'mixed community' that the Applicant claims it will become. It is far more likely to be a dormitory for those working along the Great West Corridor and wider area. There are not enough larger family homes to encourage people to 'make roots' and for it to be a true heart of the area.
43. This is in contrast to the existing 'heart' of Osterley. A flourishing community requires diversity to ensure its success. Osterley is made of mixed housing of different styles and types. It is loosely centred around the shops, restaurants and services in Thornbury Road, Osterley Library and Jersey Gardens in St Mary's Crescent, St Mary's Church and the children's nursery in Osterley Road, and Osterley tube station. It includes the Thistleworth Tennis Club and Isleworth and Syon School, all within a 5-minute walk for some 4,000 or more residents.
44. The proposed 'community hubs' at Tesco site, The Clearing, The Meander and the Water Gardens are far too small to serve the number of people who will live there. OWGRA pointed out, that the Water Gardens, where half the space is under water, will also be used as a walking and cycling route by 1,200 students attending the Bolder Academy. Even at weekends, there would be more than half of the 4,000 or more residents expecting to be able to use the open space allocated. OWGRA expressed concern that this number of people, in such a limited space, can create dangerous conditions, similar to those in a crowded tube carriage. The Clearing next to the proposed pub might safely take 100-150 people, assuming some sit and some stand, and The Meander up to 60-70 standing close together. The Applicant's drawings only show some 12 people wandering through The Water Gardens, this impression of space to roam, will not be the reality.
45. This reinforces OWGRA's concerns that the proposals would constitute an overdevelopment of the site; a smaller development would make the community hubs more useable and appreciated, not only by new residents, but also by those of us already here. The DRP expressed the same concern that: "...*the open spaces are too small for the scale of the scheme and the size of both the Meander and the Clearing feel minor in comparison to the height and bulk of buildings*". Mr Adams, the architect of the Tesco scheme disagreed; he said "*In this country we often create public spaces that are often too big*" so, he did not address the DRP's criticism.
46. Local Plan policy CC3 expects tall buildings "*be sensitively located and be of a height and scale that is in proportion to its location and setting, and carefully relate and*

*respond to the character of the surrounding area” (CD 6.1.13). Mr Adams (the architect of the Tesco development), when questioned did not explain how buildings F, G and H that rise up to 73m AOD and overlook Oaklands Avenue (part of the Osterley conservation area), can be considered to be sensitive in scale to the 2-storey houses on Oaklands Avenue. It was put to Mr Adams, that the residents of Oaklands Avenue will lose the view of the Gillette Tower. When Mr Adams was asked, if this development would provide a positive contribution to Oaklands Ave, he replied “it is a change”.*

#### **Design Review Panel (DRP) assessment of the Tesco scheme (CD 4.11)**

47. The DRP report concluded: *“... we still feel that the overall amount of residential accommodation is too great for the site and will affect the ability of the development to achieve its place making objectives.” “There is concern about the unremitting nature of development, characterised by ranks of buildings with sizeable footprints, and its impact on the wider townscape. The fly-through animation indicates that there isn’t a balanced relationship between ground, built form and sky, which is necessary to prevent the development feeling overbearing to the human scale. Although we are supportive of how the design distinguishes between taller elements with lower linking blocks, we note that these blocks are themselves still high, and feel that there is still too much development for this strategy to be successful.” “We would urge you to look again at your masterplan and consider if smaller forms of buildings that are not connected, are more appropriate.”*
48. At the Inquiry, Mr Adams conceded, that the recommendations of the DRP were not taken on board, that its fundamental concerns regarding height, massing and overall quantum of development were not addressed.
49. **Linked schemes.** There are material differences in the design of the Tesco site compared to the Homebase site. The materials proposed at the Tesco site and the block-style buildings fit with the Gillette and NatWest Bank buildings’ materials, though given their height at 3 to 4 times that of the Gillette and NatWest Bank buildings, they appear alien and out of proportion. The Homebase proposed buildings are much taller and bulkier than anything else around them and the glazed, curved corner building is strongly out of character with the immediate built environment.

#### **In conclusion**

50. From all the evidence presented at the Inquiry, OWGRA remains of the view that 16 blocks of buildings, of up to 17 storeys, across the two sites, would cause harm to the Osterley Park Conservation Area. The proposed ‘infilling’ of the skyline would dwarf and dominate the suburban and historic surroundings. In particular, the Area of Special Character, comprising the Northumberland Estate, immediately to the west of the Homebase site, would be seriously undermined by close proximity to the tall buildings. The view of the sky would be severely curtailed by the silhouette of the developments rising well above the skyline.



The developments would cast long shadows over the area (ID 1.14.25).

51. The new Access Storage building on the south-western corner of the Great West Road and Syon Lane is 5 storeys and in line with the Great West Corridor Opportunity Area, in which it sits. Local residents would find similar heights acceptable for the Tesco and Homebase developments:
- They would not compete for dominance with listed buildings in the area, especially the Gillette Tower and the proposed brick facing of the buildings on the Tesco site would complement the Tower.
  - Lower building heights, deeper set-back and more generous space within flats, could resolve the overly high density of the sites and provide a better quality of life for future residents.
  - If there were fewer residents, they would be able to take better advantage of the small areas of open space proposed.
52. We would therefore ask the Inspector, in light of all the evidence presented at the Inquiry, to recommend both applications are refused planning permission.

I will now hand back to Barbara Stryjak.

#### **MIKE SPENCE'S TVIA EVIDENCE** (Barbara Stryjak)

53. The Inquiry heard from our Expert Witness, Mr Mike Spence, of MS Environmental. Mr Spence is a leading independent consultant in Townscape and Visual Impact Assessment (TVIA) and photovisualisation (PV), with wide experience in photography, surveying and geographic information systems. He has helped develop the 'industry standard' for PV. His work regarding tall buildings aims to show accurately what the scale and massing of developments would look like.
54. He gave evidence on 18 March 2022 and showed that some of the Applicant's photographic views are misleading. They fail to show that the developments would be seen above the tree line from Syon Park and Osterley Park. Mr Spence presented photographs, 3D modelling and visualisation work produced in line with current Landscape Institute (LI) guidance.
55. Mr Spence produced a set of 15 Accurate Visual Representations (AVRs) for the Inquiry, as we had concerns about the accuracy and detail of some of the PVs produced by the Applicant. We were also concerned that visualisations from important viewpoints had not been provided by the Applicant. Mr Spence stated that the reason for his visuals was to present ***"a balanced objective view, trying to bring transparency to the whole process"*** so that ***"the Inspector gets a balanced view as to what is actually in front of them. That visualisations should be fit for purpose and capable of being verified."*** He gave his evidence on the technical methodology using open-source LIDAR data and accurate camera positioning, describing how his method complies with current

guidance.

56. Mr Spence highlighted some shortcomings in the use of lenses by the Applicant. This was of particular relevance in Viewpoint 7 (renamed Viewpoint L) taken from Osterley Park (CD 10.51). Mr Spence stated that in their scoping opinion LB Hounslow ***“said a 24 mm tilt shift lens should not be used, probably down to the work that MS did with LB Hounslow on tall building strategy. AVR London chose not to follow (this) request.” “If AVR London had been using a 50 mm lens and following the guidance I would have a lot more confidence in what AVR London have done. But they haven’t and I’m staggered that AVR London and ARC refused to come and face me eye to eye at an Inquiry.”*** Quite clearly, the images should have been produced at a much larger size with greater detail to make them helpful to the assessment.
57. Mr Spence stated that many viewpoints had been taken unnecessarily ***“they should have been dropped before scoping; they are included in the TVIA and it’s a major error... to have so many viewpoints with no view of either (development)”***. Furthermore, as the buildings proposed would be seen from many kilometres away, e.g. Richmond Hill and Harrow-on-the-Hill, viewpoints from these locations should have been included.
58. Mr Spence criticised the Applicant’s overshadowing work: ***“It is important in terms of impact on local residents. There are going to be a lot of residents impacted... and it didn’t seem to me that was coming through at all in either of the TVIAs. The areas of concern should be properties on Syon Lane and Oaklands Ave”***.
59. Mr Spence produced visualisations to fill in the gaps in the planning application. He said that more views were needed from Syon Lane and further south along Oaklands Avenue. He was critical of the conclusion to the visualisations taken on Oaklands Ave, Figure L18 (ID 1.14.26), that the visual impact on residents would be beneficial, ***“I am quite staggered that that could be a beneficial change on these sensitive residential receptors.”*** He also stated that having gone through the Applicant’s documents ***“There were no adverse visual townscape impacts that I found. There were some adverse impacts during construction, but after completion everything was either beneficial for the local residential areas or neutral for the historic assets. TVIA has to be objective, balanced, convincing in terms of understanding what the impact of these large developments is going to be on sensitive heritage assets. I didn’t feel there was any balance in recognising the adverse effects of this kind of development on residents and impacts on these historic assets.”***
60. He stated that the visualisations that he had produced ***“are the kinds of visualisations I’d be expecting... of their presentation, to you Ma’am, of the scale of these buildings.”*** Examples are visuals K12-K14 in ID 1.14.25; they gave a better idea of the scale of the building, and had not been provided by the Applicant.

61. Mr Spence compared his visualisation of the so-called 'Canaletto View' from the Thames Path with that of the Applicant. He showed that the views submitted by the Applicant of Syon House from across the river minimised the mass of the development rising above the roof line of the House. He stated that LIDAR data should have been used for this image, which shows that the developments would be visible above and adjacent to Syon House. ***"AVR London have had 4 attempts at this view. I've challenged them that this is going to be visible, and they've actually come back and agreed it is going to be visible."*** It was suggested that the Applicant's Canaletto View visualisations were correct, that Mr Spence's were not accurate, but throughout Mr Spence robustly defended his approach and stated that there was limited or no evidence regarding the Applicant's methodology.
62. Mr Spence gave examples of good and poor visuals submitted by the Applicant. He was critical of the confusing use of various colours outlining the developments. Some of the visuals were presented in too small a size to understand what is being shown, and some were taken in the wrong location. He stated that Viewpoint 8 (Figure L24) was a very good rendered image ***"It's very good what AVR London have done here. If this could have been replicated for all the close viewpoints with a 50 mm lens, which they say they've used here, then you wouldn't have me involved in the Public Inquiry."*** Viewpoint 14 (Figure 25) now includes the Homebase site whereas it wasn't in the original documents submitted as part of the planning application: ***"This is one of the problems with these visualisations, there's a lack of consistency. AVR London have updated the visualisations, a lot of them have changed, they're not the same as the ones in the original TVIAs."***
63. In summary, Mr Spence demonstrated that AVR London's choice of camera lens, the scale of the reproduced images, fields of view, viewing distances and approach to presentation did not follow any recognised guidance, are potentially misleading, and unsuitable as the basis for planning decisions. The TVIA produced by ARC was far too basic and lacking in objectivity to be considered fair for such important townscape development.
64. We say the proposed scheme will have far reaching adverse townscape and visual impacts which have not been properly examined and presented by ARC, and consequently not by AVR London.

My colleague David Pavett will now speak about Housing Mix.

#### **HOUSING MIX (David Pavett)**

65. **The Problem.** Disagreement about the housing mix regarding the need for larger family homes (LFHs) i.e. those with 3+ bedrooms, for the two developments was not resolved during the Inquiry. During the Inquiry discussion and in papers presented to the Inquiry there was conflation of "family homes" (2 + bedrooms) and LFHs. For the avoidance of

confusion this section is specifically concerned with the latter. LFHs, are a specific category in the Local Plan's targets and it is these with which we are concerned.

66. **OWGRA'S Case.** Hounslow has:

- a) a clearly established problem of overcrowding (CD 10.41),
- b) identified a growing demand for larger family homes (CD 10.41),
- c) admitted that in recent years it has failed to build sufficient larger family homes (CD 6.1.3), and
- d) set target levels for LFHs across different tenures in the Local Plan (CD 6.1.3).

67. The LFH targets in the Local Plan are significantly below the need identified in the Council's housing analysis (over 50%) summarised in Figure 35, page 53, of the Strategic Housing Market Assessment Update, October 2018 (CD 10.43). If Hounslow is to tackle its overcrowding it must, at the very least, meet the requirements of the Local Plan SC3, summarised in Table SC3.1 (CD 6.1.3).

68. Variation from these targets may sometimes be appropriate for small developments of a specific type. But in that case the pressure on other developments to meet the overall strategic minimum will increase. The targets of the Local Plan will not be met if it is accepted that a very large-scale development of 2,150 homes need not meet the default targets.

69. As Barbara Stryjak (OWGRA) told day 1 of the Inquiry, the Council recognises that Hounslow has a serious overcrowding problem. It is also clear that this development falls far short of its strategic targets for LFHs.

### **Housing Mix Discussion**

70. On day 6 of the Inquiry, David Pavett summarised OWGRA's concerns in four points: Hounslow (1) has a serious problem of overcrowding, (2) has identified a need for around 50% of new homes to be LFHs, (3) the Local Plan sets the strategic target for LFHs at around 30% (according to tenure), (4) Table SC3.1 sets the default levels which should only be changed *on the basis of evidence*.

71. Various responses were given for the Council and the Applicant by Messrs Smith, Nutt, Booth and Roberts. They argued that an exemption from Local Plan targets was justified on the following grounds:

- a) Even if the Local Plan target percentages were not met, a "substantial" number of LFHs would be provided, and
- b) We should not focus just on percentages because "absolute numbers" were also important.

**OWGRA's response.** Arguments a) and b) don't work. They confuse absolute numbers and percentages. A very large development can provide "significant" numbers of LFHs while falling far short of strategic targets.

- c) That Osterley has a higher ratio of LFHs than the rest of the borough.

**OWGRA's response.** This makes no sense unless combined with information showing that the borough is exceeding its targets for LFHs elsewhere in the borough enabling strategic targets to be met overall. Nothing to this effect was claimed. Moreover, the implication is that the developments would be part of an exercise in levelling down the housing mix to bring it closer to that of the rest of the borough!

- d) That the lower levels had been agreed with LB Hounslow (LBH) on the basis of the evidence.

**OWGRA's Response.** This argument fails because if there were such a publicly available document it would have to be accessible. We couldn't find it. An FOI request for it yielded only that no specific information was being provided because, it was claimed, the document sought was already in the public domain. It gave links to the Inquiry documents and the Officer's report to the Planning Committee (itself included in the Inquiry documents). However, Mr Roberts had told the Inquiry that the document was not included in the Inquiry materials. Furthermore, the Officer's report could not be the document requested. At best it could only report on such an agreement (which it does not do) and could not itself constitute it. Thus, an extensive search for the alleged public document has produced nothing. It is therefore reasonable to conclude that it does not exist and that claims made to the Inquiry as to its existence and location were incorrect. We conclude that there is no formal document recording an agreement, and the evidence used to establish it, on the provision of larger family homes below the default levels given in policy SC3.

Furthermore, it is very difficult to imagine what such evidence would look like. The ability to negotiate variations for individual developments must be *within the framework* of the strategic targets of the Local Plan. If some developments undershoot the target, then others must overshoot it. This is particularly the case for developments on the scale proposed for Tesco/Homebase for which the undershoot is so significant.

- e) The application conforms to the London Plan for housing mix.

**OWGRA's Response.** This argument fails because the quantification of needs in question is determined locally and is not set by the London Plan.

- f) Recent data had shown an increased demand for 1 and 2-bed units.

**OWGRA's response.** This argument is ineffective since no data or analyses were provided to show quantitatively how current strategic targets needed to be modified.

g) Generally, the development provided well for all the various size needs.

**OWGRA's response.** This argument was, frankly, devoid of any real content. It was mere assertion.

h) Building with a higher level of one and two bed homes is acceptable near town centres or in high PTAL areas or near a station.

**OWGRA's response.** This development is not near a town centre and it does not have a high PTAL. It is near Syon Lane station, but if guidelines are to be used in combination with intelligence then it should be clear that, because of the stations served by the line, along with the capacity and low frequency of the trains it serves, could not reasonably be considered to overcome the problems of inadequate local transport connections. Guidelines should be interpreted in the light of local intelligence.

72. **Hounslow is not meeting its targets for LFHs.** Mr Booth told the Inquiry on Day 10 *"I reject entirely that the Council is failing to meet its targets."* However, in the Council's Housing Strategy 2019-2023 (CD 10.41) we read *"Most new homes built in Hounslow between 2010 and 2017 ... were typically one or two-bedroom properties, leading to a decreasing proportion of family-sized properties between 2010 and 2017"*. Also *"... housing delivery in the last strategy period remained skewed towards small properties..."*.

73. It is also important to note that the London Plan section on housing mix requires that *"Boroughs are encouraged to set out the preferred housing size mix (for all tenures) as part of a site allocation."* (CD 6.2.10). As far as we can ascertain Hounslow did not do this for the Tesco and Homebase developments.

The Planning Statement for Tesco even claims that the London Plan advises boroughs not to set targets for different tenures (CD 2.2, para 8.1.2, 8.1.3, 8.1.6 and 8.1.7)! This is directly contradicted by the above statement from the London Plan.

It is also claimed in the Tesco Planning Statement (in para 8.1.7) that the Great West Corridor Local Plan Review *"represents a significant change from the [housing mix] proportions given in the adopted Hounslow Local Plan"*. In fact, that review merely reproduces Table 1 from the Strategic Housing Market Assessment Update, October 2018 (CD 10.43) and says that this table gives *"The required housing size and mix ..."*. (CD 7.2.2, paragraph 4.21). The proportion of LFHs in Table 1 is, as we pointed out during the Inquiry, even higher than that of Policy SC3 in the Local Plan (CD 6.1.3).

In the Tesco Planning Statement (paragraph 8.1.6) the unit sizes are based on *"St Edward's assessment of demand for this type of accommodation in this location"* but provides no evidence used for that assessment.

At no point in the above-mentioned documents is evidence presented as to why the proportion of LFHs in the Tesco and Homebase developments should be significantly below the strategic targets of the Local Plan.

74. **Conclusion.** The proposed development is very large. Failure to reach strategic targets will impact negatively on Hounslow's attempt to deal with overcrowding. The long-term effect would be to perpetuate the borough's overcrowding problem. Since no good reasons and no objective evidence for this have been provided to justify proportions of LFHs significantly below the default levels in the Local Plan, we believe this should be sufficient reason to refuse the application.

My colleague Dominic West will now speak about Roads & Transport.

## **ROADS & TRANSPORT (Dominic West)**

### **Roads**

75. As the Inspector will be aware, OWGRA has made repeated requests for the TfL traffic scenario information, which to date has not been provided. We say it is vital for the Inspector to have this because it is important to corroborate TfL past statements that the Gillette Corner Junction is up to capacity and needs major re-design to accommodate any new developments.
76. A concern was raised at the roundtable discussion about the traffic modelling of rugby at Twickenham and its effect on Gillette Corner. Rugby away coaches and general traffic use Syon Lane/Spur Road as part of the rugby match day route, as do football (and other sporting events) at the new Brentford Community Stadium. In response we were told that it didn't matter as these were 'occasional' events. We challenged this given the number of not just rugby matches but also other events scheduled at these venues and their impact on both the local road network and limited rail capacity at Kew Bridge station.
77. The discussions also covered the negative effect of the proposed signalised junctions in the vicinity of the Homebase site, and in particular the impact of vehicles leaving the new Tesco store at peak times such as Sunday afternoons. Again, no detailed modelling scenarios were presented. Again, we say these are matters the Inspector will need to consider.
78. With respect to the westbound bus stop on the Great West Road, it was accepted that in order to accommodate a potential new bus route which would turn right at the Gillette Corner junction, the bus stop would need to be relocated some 40m further east. The Inspector will recall that the Applicant failed to respond as to how this extra 40m distance could be considered as convenient to passengers. No consideration was given to the impact on the mobility-impaired and those with more than 1 day's worth of shopping.
79. We believe that far from making the bus stop more accessible it would do the exact opposite. This is further evidenced by the fact that the proposed improvements to the

cycle lane on the south side of the Great West Road take up the existing footway width necessitating the relocation of the bus stop further east. This will also be required to enable buses terminating at the new bus stand on Syon Lane (if the E1 bus is extended there) to safely cross 3 lanes of traffic to enable them to turn right at Gillette Corner. This was not disputed by the Applicant.

### **Absence of traffic modelling on Northumberland Avenue**

80. The Council acknowledged, during the roundtable session that the proposed developments will have an impact on residents living around Northumberland Avenue (across the road from the existing Homebase). The Council stated that the anticipated traffic in Northumberland Avenue has not been modelled, as part of the traffic around the critical Gillette Corner junction.
81. This again illustrates OWGRA's concern that matters have not been looked at carefully and not to the level required to enable permission to be granted.

### **Cycling improvements**

82. During the roundtable discussions, the Applicant asserted that improvements would be carried out to link the development with the proposed CS9 route on the A315 London Road.
83. However, during examination no proposals were tabled for Spur Road, with the only proposals shown being for Syon Lane north leading up to the existing Tesco store. The improvements to cycling on the Great West Road are limited to a partially off-road cycle route on the south side as far as the Syon Lane junction. After that cyclists have to rejoin the main carriageway.

### **Gillette Corner subway**

84. The Applicant claims that the developments will fund improvements to lighting and to the general appearance of the subway.
85. However, during the transport roundtable discussions, it was confirmed that improvements detailed in the Section 106 agreement were capped at £136K. These would also include funding for public realm works around the subway from the route to/from Homebase and Tesco.
86. We believe that this contribution is only capable of funding a modest set of improvements, not what is needed to mitigate the impact of the development.



## Public Transport

87. Before the Inquiry OWGRA felt that there is a lack of adequate public transport provision to serve and enable the two proposed developments.
88. We say the Inquiry process has not provided the assurance that our concerns were either without merit or have been resolved.
89. The Inquiry needs to be satisfied that the necessary mitigation is not just offered, but mitigates.
90. What we do know is that:
  - a) Public transport connectivity is currently at the lowest end of the PTAL scale (PTAL 2, with 1 and 3 in the outer margins); whereas large-scale high-density developments like these require PT connectivity at the highest level – i.e. at or close to PTAL 6b, as prescribed by London Plan Policy D3 (CD 6.2.26);
  - b) LBH and TfL, in their Great West Corridor Transport Masterplan October 2020 (CD 10.39), have identified the lack of PT connectivity as a major constraint affecting development across the GWC Opportunity Area, particularly at the western end, where these two developments are proposed. It also identifies the need for two new PT connectivity packages incorporating additional rail infrastructure and bus services packages that are essential to remove this constraint and unlock development potential;
  - c) London Plan Policy SD1 (CD 6.2.1) states that the enabling infrastructure required for the Great West Corridor Opportunity Area is classified as ‘nascent’ i.e. its feasibility (including affordability) is not yet proven, and not classified as ‘planned’, which puts it in a much less advanced category than ‘planned and funded’;
  - d) In response to OWGRA’s questions at the Inquiry about the absence of any certainty regarding funding and delivery, no detailed response was given during the roundtable discussion.
91. However, the Applicant’s evidence to this Inquiry is that the present public transport provisions are adequate for the proposed new extra residents (estimated at up to 6,500). The H91 which runs along the Great West Road is already frequently full not only during weekday rush hours but also at weekends. The Applicant claims only one extra bus service is needed to link Osterley to Ealing Broadway – a 35-mins plus bus journey. But the Applicant has failed to provide any detailed evidence for this claim.
92. This does not answer OWGRA’s objection that the critically necessary connectivity infrastructure remains unfunded, with no certainty about funding for the foreseeable future. At no point has any evidence of public transport modelling been provided to support the case for the predicted trip generation including at weekends.

93. During the Inquiry the Applicant and the Council failed to respond to the following fundamental issues (and we believe that these are all key areas over which the Inquiry needs to be satisfied):
- a) How the conclusions of LBH and TfL in their GWC Transport Masterplan, October 2020 (CD 10.39) could now be ignored i.e. that major investments in rail infrastructure and bus service packages are critically needed to unlock and enable development across this Opportunity Area. This applies particularly to the western end where the PTAL is very low, and where these large-scale high-density developments are proposed.
  - b) Why the developments should be exempted from London Plan Policies D3, D2 and D4 (CD 6.2.25-6.2.27), which dictate that large-scale high-density developments like these require PT connectivity at the highest level – i.e. at or close to PTAL 6b (CD 6.2.26). Also, that development density should be proportionate to the site’s public transport connectivity and accessibility i.e. lowest PTAL can only support lowest density (Policies D2 and T4 (CD 6.2.25 and CD 6.2.27)).
  - c) Where the evidence is that existing public transport services (SWR, two bus routes and Piccadilly Line) have the spare capacity to accommodate the additional demand from up to 6,500 additional residents. It is a fact that these services are already at capacity and congested during peak working hours and school times, following the impact of all the recent housing developments before one gets to Osterley. The upgrading of the Piccadilly Line infrastructure is unfunded and has been shelved indefinitely. This is a prerequisite for unlocking the full capacity of the new Piccadilly Line trains as it provides a 60% increase in capacity. Conversely, the Applicant’s proposed additional ticket gate at Osterley station does nothing to increase the capacity on the line. Getting inside a station is not the mitigation. Getting on a train is. Osterley station is at least a 25-minute walk away from the two sites. This demonstrates that the Applicant’s public transport modelling and assumptions lack the necessary rigour and therefore credibility.
  - d) Despite repeated requests from OWGRA, the Applicant and the Council failed to provide clear and verifiable evidence about their consultations with the transport authorities, to demonstrate that the infrastructure and services have the capacity to cope with up to an extra 6,500 residents. No such documentary evidence was posted by the Applicant or the Council in the Library of the Public Inquiry. The Freedom of Information route did not yield any documents on this subject, other than a response from Network Rail’s Asset Protection (ASPRO) Team which is concerned only with physical impacts from works such as piling and excavation of the proposed developments on their physical infrastructure – nothing to do with rail route capacity.
  - e) LBH Officers gave assurances to the Council (Planning Committee) that the critically necessary rail and bus connectivity packages would be funded and delivered to support and enable these developments. However, during the Inquiry they back-tracked on this, claiming the connectivity packages are no longer considered necessary, just “nice to have”, and that the existing PTAL with the addition of one bus service would be sufficient.

94. We say the Applicant's claim that the existing low PTAL with one extra bus service is enough for up to 6,500 additional residents is clearly unjustified and misleading.
95. We believe it is not possible to permit these two large-scale high-density developments without the timely provision of the necessary rail infrastructure and bus service packages that LBH and TfL have identified as necessary. To do so would cause harm.
96. Therefore, OWGRA believes that the proposed planning application, if accepted, would constitute a gross overdevelopment. London Plan Policy T4 (CD 6.2.40) states that *"where ... existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure"*.
97. For this reason alone, these applications should be refused.

I will now hand over to Mohsen Zikri and Lis Guest who will speak about Environment and Living Conditions.

## **ENVIRONMENT & LIVING CONDITIONS (Mohsen Zikri & Lis Guest)**

### **Climate Change, Zero Carbon & Carbon Offset**

98. It is disappointing that the Tesco & Homebase developments would not be zero carbon. To reach net zero, the Applicant is proposing to make up the substantial shortfall by paying into a carbon offset fund. Carbon offsetting should only be used as a last resort when all other possibilities have been explored. No evidence was presented to the Inquiry about what alternatives were explored, if any.

### **Single Aspect Units**

99. We (OWGRA) have argued from the beginning that there were far too many single-aspect homes, which we say is contrary to London Plan Policy D6 (CD 6.2.29). This fundamental issue was not resolved during the Inquiry, and we continue to believe that this remains a significant matter worthy of clear consideration, if the Council is to achieve its stated objective of ensuring that all homes are of high quality (CD 10.41 *"To provide a choice of high-quality housing for people at all stages of their lives at prices they can afford"*).
100. During the roundtable discussion we were told by Mr Roberts that the Applicant had gone *"far enough to minimise the number of single aspect homes"*. As the Inspector heard, the Hounslow Design Review Panel (DRP) clearly did not think so and criticised the high proportion of single aspect units (35% on the Homebase site and up to 50% on

the Tesco site). The Inspector asked what the proportion of single aspect homes was when the DRP first reported and by how much it had been reduced; Mr Roberts didn't provide an adequate answer.

### **Overheating, Mechanical Ventilation**

101. This summer's heat wave has shown that it is cooler to stay indoors and prevent hot air coming in by shutting windows and closing curtains/blinds.
102. During the roundtable session we expressed concern that during hot weather overheating will be exacerbated, particularly in single aspect homes, as mechanical ventilation will pump more hot air into those homes. To prevent overheating, additional energy-intensive air cooling would be required. No solution was proposed to deal with this problem, which will result in significant and recurring higher energy bills for the 166 single aspect homes and 128 'semi-dual' aspect homes on the Homebase site, and at least 750 single aspect homes on the current Tesco site, all of which will rely on mechanical ventilation. Mr Roberts, for the Applicant, said he couldn't provide a technical answer, so the problem of overheating remains an unsolved major issue, affecting comfort and fuel efficiency, and is contrary to London Plan Policy D6 (CD 6.2.29). The inevitable result will be to increase future energy bills for those residents. The Applicant suggested that the heat wave was an "exceptional" circumstance and that the proposed buildings would be acceptable in normal circumstances. However, all the evidence, including Climate Change data, points towards current "exceptions" becoming more frequent and intense. As we all know Climate Change and its impact on the world we live in is real, and not just a one-off.

### **Daylight/Sunlight/Overshadowing**

103. During the Inquiry, Mr Roberts acknowledged that *"there is a degree of reduction in light that largely relates to the low density of the existing sites and the density of the development then proposed"* but that this was then subjected to further analysis of how much light people are left with *"to come to a proper balanced judgement about the quality of light those properties will enjoy in the future."* Our concerns relate to some of the properties in Northumberland Gardens, Syon Lane and Oaklands Avenue and they were not satisfactorily addressed during the Inquiry, especially as it has proved difficult to access all the data, and the Inspector herself stated that she had noticed that not all of the Environmental Statement was in its complete form in the core document library (e.g. CD 2.5.5 was missing chapter 13, and that is still missing).<sup>1</sup>

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<sup>1</sup> The Inspector informed us that the relevant chapter had been added to a different section of the core document library.

## **Air Quality**

104. We remain very concerned about the level of air pollution at Gillette Corner. Mr Rusby, for the Applicant, rejected the use of the Breathe London data from its monitoring unit at Gillette Corner on the grounds that its instrumentation did not meet reference standards. We understand the point, but we regret that the Council has not installed reference standard equipment at this very busy location, which residents have been requesting for some years.
105. Mr Smith for the Council claimed that the pollution levels at Gillette Corner were within the UK limit values and that this was indicated by the monitoring equipment which Mr Rusby said was near to Gillette Corner. Specifically, he claimed that the Busch Corner monitor was one such. The problem with this is that, as reported to the Cabinet in London Borough of Hounslow Air Quality Annual Status Report for 2021 (published 31st May 2022), Busch Corner is one of the few monitoring points showing a yearly exceedance of the NO<sub>2</sub> limit (40 µg m<sup>-3</sup>) at 44.1 µg m<sup>-3</sup>. The report for the previous year also shows an NO<sub>2</sub> exceedance at 40.5 µg m<sup>-3</sup> even during the partial shutdown due to the pandemic.
106. The Busch Corner junction is important but very much smaller than that at Gillette Corner, where the throughput of traffic is several times greater. We respectfully ask the Inspector to consider, in the absence of compelling direct measurements, if the NO<sub>2</sub> pollution at Gillette Corner is likely to be less than that at Busch Corner. The potential development of the Gillette Building as a film studios, ultimately employing some 2000 people, can only add to Gillette Corner's traffic throughput.

## **Amenity Space**

107. During the roundtable discussion about amenity space, we stated that there is a shortfall of 1,600 m<sup>2</sup> at the Homebase site and 4,343 m<sup>2</sup> on the Tesco site. Mr Smith for the Council said that the standards for amenity space are not fixed minimums and that there is flexibility subject to design and that *"The design is of a high quality in that context, and we thought that was acceptable."* Nevertheless, there is still a shortfall in amenity space as set out in policy SC5 of the Hounslow Local Plan (CD 6.1.15) which gives benchmark standards for amenity space.
108. Mr Roberts stated that private amenity space is compliant with the London Plan except for 12 flats on the Homebase site. He stated that *"the communal amenity target is not ... rigidly applied to developments that are of a higher density where they're optimising the capacity of the site of this nature."* So there is a shortfall of amenity space compared to the benchmark standard.
109. Mr Roberts stated that there were a number of public open spaces close to the sites. Syon Park and Boston Manor Park are 11 and 14 minutes' walk away respectively from Homebase, and Jersey Gardens is 14 minutes' walk from the Tesco site, so not exactly

on the doorstep, thus depriving families with young children and senior citizens of adequate access. All other parks are more than 15 minutes' walk away.

110. In our Proof of Evidence on Green Space (ID 1.14.9) we showed that there would be a significant shortfall of 474 m<sup>2</sup> on the Homebase site of play space for children and a deficit of either 94 or 538 m<sup>2</sup> on the Tesco site. The Applicant and Council have not provided an explanation for the different figures given in different documents (CD 2.2, CD 4.4).
111. Provision of roof-top amenity areas would be counterproductive to levelling up, as access assumes that residents of affordable homes are capable of paying the higher service charges, dictated by the increased costs of maintaining landscaped areas at roof level. The higher maintenance costs were acknowledged by the Applicant and the Council. Furthermore, noise of aircraft every 90 seconds heading for Heathrow over the Homebase site roof-top amenity, makes it not fit for purpose, and the Applicant has provided no solution.
112. Covid 19 has highlighted the critical need for adequate open green spaces. The Applicant has failed to recognise and plan for these needs, particularly as the two developments were being finalised during the pandemic. This is hugely disappointing, because a scheme of this scale and nature should be leading by example, as many in the sector are now doing. By way of example, the developer, British Land, is providing generous and easily accessible areas of green spaces at their London sites.

The Summary & Conclusion will now be covered by Barbara Stryjak.

## **SUMMARY & CONCLUSION** (Barbara Stryjak)

### **In summary we say:**

113. The form, height, scale, massing and density of the proposed developments, with up to 16 blocks, some reaching 17-storeys, are totally out of character with the area and would dominate the nearby low-rise buildings. This fact was demonstrated by the 3D Model and professional photos commissioned through OWGRA's modest resources, and corroborated during a 2-day accompanied site visit led by the Planning Inspector.
114. The proposed developments fail by a very large margin, to meet the objectively assessed housing needs in Hounslow. The Borough requires considerably more larger family homes (3 & 4 bed homes), not more studios, and overcrowded 1 & 2 bed flats. By way of reminder, the make-up of the developments is that over 80% of the flats would be studio and 1 & 2 bedroom.
115. The applications conflict with planning policy on a number of key and fundamental areas: particularly relating to building high density developments in areas with poor

PTAL.

116. The public transport provision in the area is already way beyond its capacity. Long queues at bus stops result in long waits for buses with available capacity, and the new H91 buses only have capacity for 81 passengers, compared to the previous 89. The tube is already packed from 7 am at Osterley. How public transport will serve and support the needs of these developments has not been adequately demonstrated.
117. One of the Council's stated aims is to build high quality homes. However, it chose to ignore the serious concerns raised by its own Design Review Panel. We say substantial weight needs to be given to this.
118. We say these developments should demonstrate learning from the pandemic and also changes in our climate. The types and quality of accommodation as well as the quantum and usability of the outdoor areas are now more key than ever before. However, the proposals fail to demonstrate any innovation or forward thinking. We say this is a missed opportunity and the failure or refusal to innovate must not be accepted.
119. These developments would cause permanent harm to local heritage assets, primarily Gillette (the Grade II listed building), and create irreversible harm to strategic views from Kew's Royal Botanic Gardens, Syon Park and Osterley Park.
120. The harms would outweigh the benefits.
121. For all these reasons, we ask these applications be refused planning permission.
122. In May 2022, the Secretary of State, announcing his plans for levelling up and housing stated the following, and I quote:  
*"You've had dormitories, not neighbourhoods. So... beauty, infrastructure, democracy, environment, neighbourhood. People have been resistant to developments because far too often you've had numbers plonked down simply to reach an arbitrary target. Too many new homes have been ugly, shoddily constructed and of poor quality. Identikit creations plonked down without regard to the shape and character of existing communities. Many new developments have not been accompanied by the investment in infrastructure required alongside. So schools, GP surgeries and roads have become increasingly under pressure and existing residents' quality of life suffers. And all of this has meant that instead of creating and enhancing neighbourhoods we have seen dormitories planted in the wrong place in the wrong way. So we are giving local communities the ability to prescribe the design of new homes, and I will use my powers to enforce high aesthetic standards on new developments. Some of our big housebuilders, used to imposing their wishes on communities, may balk."*  
We totally concur with these comments of the Secretary of State.

**To conclude:**

123. We have said all along that the principle of development is accepted on these sites. We said that redevelopment must provide housing which not only respects the area's residential character and its heritage, but it must also meet known local housing needs.
124. All residents should be entitled to a healthy and happy existence. This requires guaranteed access to adequate public transport, the necessary local infrastructure and utilities. We say that a suitable replacement for the Tesco site would be a 21st century equivalent of the local Wyke Estate, with plenty of houses, and low-rise blocks of flats with generous open spaces. Our limit is 6-storeys to match the height of the nearby Grade II listed Gillette building.
125. We respectfully request that the planning applications be recommended for refusal. Only a refusal will allow a high-quality development to come forward. Only a refusal will create opportunities to enhance the area and provide new residents with the type of accommodation which meets their direct and immediate housing needs. Only a refusal will send a message that building a cohesive community is important.