

# **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.