



The Right Hon Michael Gove MP
Secretary of State for Levelling Up, Housing
and Communities and Minister for
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Dear Secretary of State

Request to Call In - Homebase, Syon Lane [00505/H/P19] and Tesco, Syon Lane [01106/B/P137]

We are Councillors for Osterley and Spring Grove Ward in the London Borough of Hounslow and have followed, pursued and worked with individual residents, residents' associations and amenity groups since proposers of the two developments publicly revealed their intentions in May 2019. By that time proposals appeared to have been well advanced with numerous pre planning discussions with senior staff and leadership at Hounslow Council alone and not communities.

In terms of public consultation, what followed, under the cloak of lockdown, was a series of scant and motherhood and apple pie letterbox brochures misrepresenting developer and council intentions. There were also mostly misleading social media surveys where results were never revealed at Planning Committee, mainly because the non phony responses vastly outweighed the bona fide and analytical from genuine respondents with locus.

The developer promised scale models but these were never delivered thus leaving it to the Osterley and Wyke Green Residents Association to spend its meagre resources on commissioning an accurate piece.

For those who have taken a close interest, those who properly know and represent local communities in this part of the borough, feel that they have seen no more than 0.00095% change in the proposal since the applicants' delayed and shambolic Planning Presentation event in July 2020.

We have tried to comprehend the hurry to approve these schemes, particularly because these applications are the largest we have ever seen in such a relatively small geographical space, anywhere in the borough. But also, the developer and council jumped the gun before the ink on the draft revisions to the Hounslow Local Plan are hardly dry and, we believe, the Secretary of State has yet to appoint an Inspector to lead the public inquiry.

The *virtual* Planning Committee meeting on 8 April 2021 was rushed, premature and questionably chaired with comments made by officers presenting appearing, as many since described, as professionally compromised. The balance on presentations for and against the developments were

one sided with no opportunity for opponents comment on officer explanations because these were not delivered at the outset. Neither the same with the applicant because they were allowed the last word without challenge. Ward Councillors were given five minutes each, totally inadequate on such large scheme proposals.

Like residents, Ward Councillors are not averse to development in this area but we do have numerous concerns with these two, naturally linked planning applications. We have serious questions and genuine worries about infrastructure, traffic, transport, housing heights, size, mix and design and felt that we made it clear but the long running 'we need housing' mantra at whatever cost prevailed for the misinformed and blinkered that night.

Transport and infrastructure are significant concerns for this site. We understand that it is within an 'opportunity area' and welcome some form of development but the balance in this situation is askew.

We know that Transport for London have assigned a Public Transport Accessibility Level rating of just above 1 in Osterley, compared to above 4 in Feltham and 6 in Hounslow. The planners' report wrongly stated most of the site is at PTAL 2 and will at best after many unfunded and descope projects be a 3. With regards to the vaunted West London Orbital, TfL has no money and this scheme featured in no election manifesto. The proposed Southall Link to Crossrail also has no money and the time frames set out are clearly pie in the sky. With such proposed density, we would not, in the least, regard this a sustainable development. The number of cycle spaces are all well and good but apart from fairly average tracks along the Great West Road, the road is not safe to cycle on through well used and already dangerous junctions with poor air quality to boot.

While the developers may talk about low level car parking for their sites, the sheer number of units combined with the poor PTAL will force occupiers to park in neighbouring streets impacting on existing residential amenity. It is neither acceptable nor correct that current residents should have to experience long hours controlled parking zones in a few years' time because of poor planning today.

Reviewing the traffic studies, the report talks of much longer queues to access sites and the Great West Road than observed at present and suggests that the impact on the local road network may be significant. We cannot really call this a green recovery when greater congestion will happen if this scheme is approved, the responses from Hounslow Cycling seems to agree.

This is also one of many issues with the traffic element for the proposed replacement food store on the Homebase site and it is more than worth telling that TfL do not believe nor trust the developer on their suggested number of servicing trips for this site, leaving us with potentially illegal and dangerous on-street servicing of the store.

The developer speculates that Covid outcomes may reduce transport usage. TfL already predicts transport numbers to be in excess of the pre-Covid baseline in 2025; that this scheme, if approved, would start to occupy at that point yet the planners' report to committee did not consider this modelling. Yet on the flip side, the significant increase in driving has not been adequately modelled

Our Ward currently has just over 13,400 residents, this combined, proposal will almost increase this by 50% without the required capacity to cope. The developments are too big, the equivalent of landing something with a population the size of Bagshot here in Isleworth.

Travelling by tube in a normal year from Osterley or indeed Boston Manor, commuters are familiar of waiting at the platform trying to board London bound Piccadilly Line train, with each one passing at full capacity. Now imagine that base line with an increase of 4,000 people trying to get on; similarly, travelling towards Waterloo from Syon Lane.

We accept some form of development at these sites however, we have not been presented with any idea of the infrastructure required to support these large scale developments. The developer cites the *15 minute neighbourhood* without any proper nor researched evidence. Osterley tube 22 minutes away, Boston Manor 32, the nearest doctors 25-30, the nearest dentists 18 and these are all over subscribed.

In 2025 we would not honestly be able to tell our constituents why they cannot get a GP appointment or school place because this inadequate scheme was approved without the proper infrastructure. The planners' report relies on the goodwill of the developer to provide a surgery *at some point*, something neither offered or guaranteed.

The developer proposes and planners accept the significant under provision in communal amenity space at the Homebase site of just at 4,928 sqm, significantly below the benchmark standard. This huge under provision is considered acceptable purely because of the need to fit in a supermarket. Too much in too small a place, to the detriment of future occupiers. 2,370sqm of play space should be provided for 240 children, yet just 500sqm less than that. To add further insult this is not proposed for on site. The developer considers it acceptable and planners agreeable to make up provision over half a mile away on the other side of the railway track, and into Brentford in the Leader of the Council, the lead member for Planning's Ward.

We should also add that there has been absolutely and bizarrely no discussion with Osterley and Spring Grove Ward Councillors nor our residents on any amenity or suggestions for legally agreed community provisions arising out of these developments.

Even after the Hounslow Council and Mayor for London determinations, the report submitted still shows that this scheme is not right in its current form. The Secretary of State should insist that the developers and authorities have to make the time to go back and get it right, most people are now in the market for bigger units to allow for working or recreating from home. This proposed scheme was developed long before this shift in work life. To date Hounslow Council has not published verifiable data for housing need nor numbers of accepted homeless. The proposed high density at this location needs to be justified and balanced in the context of recent new builds and pipeline approvals elsewhere in the borough.

Public transport use at present is at a record low, and more people are driving, please send this back to the applicants and get them to truly engage with the community. The planning committee were urged to place a Grampian Condition, similar to other large development proposals such as at the Old Kent Road sites which cannot be fully built out until the Bakerloo Line extension starts, this was discussed by planning committee members because it was not commented upon by the council's planners or traffic professionals.

In terms of gestation and the size of these schemes, these have seen less pre decision making exposure than the Ballymore Brentford Project which, in itself, is a bona fide regeneration plan, long in discussion and consultation. It is bigger than the Brentford Community Stadium scheme and its associated blocks but with fewer local facilities and impacting more established residential neighbourhoods. Drawings and ideas for this part of our Ward were shared with planners, council chief officers and council leadership a number of years ago but only came to light in 2019.

Despite Member consultations on the development of the Hounslow Local Plan Review where the consensus was no developments higher than six stories by established 1930s developments or more than 10 stories within the Great West Corridor proper. The final publication was a bulldozed draft unrecognisable from the expected outcome. This does not appear to be a new idea and a number of

critics have suggested that the recently submitted Draft Local Plan for the Great West Corridor was tailored to help pave a path for this and similar applications. We would hope that, as a new Secretary of State, you will be your own man and agree with what many other ordinary folk do that very high buildings do not make for sustainable and peaceful communities.

It has been suggested the Community Infrastructure Levy will help pay for the services required to compensate for shortfall in transport, health and recreational provision over and above the meagre elements offered within the applications. This is nonsense.

At paragraph 11.5 of the Homebase site report, the CIL amounts quoted for are, £11.1m for Hounslow and £4.2m for London. Never, ever enough to pay for a safe, healthy and sustainable neighbourhoods. The second report quotes an estimated £21.2m for Hounslow and £9.3m for London for the current Tesco site but this will be piecemeal and not guaranteed.

How ever presented, these developments would be an adjunct to the Northumberland Estate, Syon Lane and Oaklands Avenue, not the eastwards facing Great West Corridor as, because of its largely residential nature, it has little in common with the rest the stretch to Chiswick Roundabout.

The published documents were not user friendly, perhaps a symptom of the rush to get them to committee although there is no explanation for this imperative apart from wanting to obfuscate. Each report contained at least 175 pages, none numbered, making it difficult for members of the Planning Committee to follow references. Paragraph 8 of the Homebase report had 501 sub paragraphs. There are numerous comments and objections from a number of parties from paragraph 6.5 onwards, all themed, but not grouped nor appear to have been or shown to be fully assessed. The report did no justice to the 830 residents individually writing in. There were no comments from the London Ambulance Service which uses Syon Lane to the Hospital nor, despite numerous requests, Hounslow Highways. There was complete disregard for the comments from Historic England and all other heritage organisations that took time and made effort to put their professional cases forward.

At paragraph 6.5, Transport for London maintained its reservations on both, but particularly the Homebase scheme. This was highlighted to the committee by objectors but not clarified by transport and planning officers on the night suggesting only one other blinkered imperative. The developer proposed cleaning the Gillette Corner Subway lights as an enhancement which is no substitute for pedestrian safety and convenience that residents and workers at Sky HQ have clamoured for safe surface crossings here for years.

The report at paragraph 8.163 appeared to brush aside Hounslow Council's independent Design Review Panel's assessment, critical of both, not least the Homebase scheme, even having looked at it twice.

They said to planners, *"we are still certain that the footprint of Tesco is compromising your ability to provide public realm that is good enough in character or scale for this quantum of new housing. We would have liked to see a clearer vision for the two sites and commitment to delivering the at grade crossing, which is the first essential piece of the wider masterplan."* They maintained their concerns about limited and unmanageable amenity space and safety, particularly concerned with how potentially unsafe these cut throughs between blocks are likely to be.

The Design Review Panel also spotted the strange description of *"semi dual aspect"* flats, but half of dual is one, resulting in no through draught in a location where in summer it will get hot. More than 27% of the units on the Homebase site would have this feature; just one window on just one aspect, whichever way it's looked at. The second aspect would be towards a solid brick wall.

We are very concerned about the existing 20 properties at Northumberland Gardens, opposite Homebase. Each maisonette will be overshadowed and each will have windows affected, all by at least 20% and some by as much as 40% and over. Along with limiting light to more than a quarter of potential new properties, the height and bulking of this development will darken the living rooms and bedrooms of our existing residents.

CONCLUDING

There could be alternative and more humane schemes to submit but these have not been considered by the applicant nor suggested or encouraged by Hounslow Council.

These developments are still not ready and if, as applied for, are not refused on grounds of non compliance with the current and operational National Planning Policy Framework, Local Plan, amenity, impact on neighbouring properties, inadequate and unguaranteed traffic and transport management; no direct contribution to rail improvements; lack of amenity and inadequate alternative space, then they should be.

CONDITIONS

Should the Secretary of State be mindful of approving these applications, very much preferably amended, in this very sensitive area more stringent conditions are required, not least in great need for bringing forward the Access Review before any further work is done.

Revisions sought would include,

1. No occupation of either site until the completion of public transport improvements and renewals in the Great West Corridor Opportunity Area. We ask that this is tied in to, 1 the Piccadilly Line upgrade, 2 the West London Orbital, 3 Great West Road bus improvements, 4 the Southall Rail Link. We believe that this will protect our current and future potential residents by ensuring the infrastructure is in place before development is built out.
2. Installation of TfL and Hounslow Highways junction works at Gillette Corner, Wood Lane, Busch Corner and Thornbury Road.
3. A Construction Plan which would not disturb residents on Northumberland Estate, Syon Lane, Wyke Estate and Great West Road.
4. A legal agreement to make an endowment fund of not less than £3m to support an independent Osterley Sports Network CIC, to develop and maintain sports and recreation in Osterley and Spring Grove Ward, significantly absent from these applications.
5. This development will impact the area like no other for decades to come. It has to be done right. There are too many clear indications that these developments are inappropriate by a large margin. Will the Secretary of State wish this on the local population?

As Ward Councillors, we are not against any development, but are against schemes that are not fit for the area or for the needs of the local residents. We should expect the best for our residents and the future occupiers of these homes. We should not settle for less, so how can we, you, agree to support a development in a location where the infrastructure is simply not there to achieve it?

Finally, we ask the Secretary of State whether he is 100% sure that as this development stands, it is appropriate? If there is any doubt, then we ask you to reject or defer these schemes until more suitable schemes are put forward.

Happy to have you over for a closer look, should you have the time.

Thank you.

Yours sincerely

Tony Louki, Unsa Chaudri and Richard Eason
Labour Party Councillors for Osterley and Spring Grove Ward

cc via email

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