

Elizabeth Humphrey
The Planning Inspectorate
3/J Kite Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

Osterley and Spring Grove Ward Councillors
London Borough of Hounslow
Hounslow House
7 Bath Road
Hounslow
Middlesex TW3 3EB

via email to:
ELIZABETH.HUMPHREY@planninginspectorate.gov.uk

Reference: APP/F5540/V/21/3287726
and APP/F5540/V/21/3287727

Your contact:
Tony.Louki@hounslow.gov.uk 078 6678 4580
Unsa.Chaudri@hounslow.gov.uk 073 7553 2063
Richard.Eason@hounslow.gov.uk 079 7670 2950
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Dear Ms Humphrey,

Town and Country Planning Act 1990 - Section 77 and Town and Country Planning (Inquiries Procedure) (England) Rules 2000

Applications by St Edward Homes Limited, St Edward Homes Limited

Site Addresses: Homebase, Syon Lane, Isleworth, TW7 5QE and Tesco Osterley, Syon Lane, Isleworth, TW7 5NZ

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.

Between us, we have a combined 20 years of representing this part of the Ward.

We should like this submission to be put before the Inspector and would welcome the opportunity to formally participate and present at the Inquiry.

The schemes

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.

This area has been considered for development for several years prior to plans emerging in 2019. Unlike other developers however, the developer for these sites has failed to properly adjust to pandemic conditions meaning the local community were unable to properly influence and shape the scheme. The consultation focused largely on a series of scantily detailed letterbox brochures rather than meaningful engagement using digital and in person platforms. There were also similarly misleading social media surveys which appeared to many to be focused on drumming up support for the scheme, not improving it and the results were not revealed in the applicant presentations at Planning Committee on 8 April 2021.

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

The decision making process

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 not much, if any, change in the proposal since the applicants' delayed remote Planning Presentation event in July 2020.

The developers rush to submit these proposals has created conflict where there was opportunity with a more thorough engagement to have achieved a consensus with the community for an appropriate scheme. This is made more acute because these applications are the largest ever seen in such a relatively small geographical space, anywhere in the borough. But also, the developer jumped the gun before the ink on the draft revisions to the Hounslow Local Plan were hardly dry and the Secretary of State had yet to appoint an Inspector to lead that public inquiry.

Like residents, Ward Councillors are not averse to development on either site but do have numerous concerns with these two, naturally linked planning applications. Councillors have serious questions and genuine worries about infrastructure, traffic, transport, housing heights, size, mix and design.

Whichever way 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 of the stretch to Chiswick Roundabout.

The documents provided by the applicant were not user friendly making it more difficult for residents to engage with the proposals in a meaningful way, this is something that should be reviewed at a national level if we are to ensure planning is accessible to ordinary residents. As a result of the applicant's documentation each planning report contained at least 175 pages and paragraph 8 of the Homebase report had 501 sub paragraphs. This also appeared to make it challenging for members of the Committee to assess the valid points raised by all parties including those raised by Historic England.

At paragraph 6.5, Transport for London maintained its reservations on both, but particularly the Homebase scheme. 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 Design Review Panel was critical of both schemes and advised the developer that *"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. Design Reviews are expert bodies and for the developer to ignore such specialist advice is disappointing, particularly as the points raised are ones which would have significantly enhanced the scheme, making it more palatable for Ward Councillors and residents.

We are very concerned about the impact of these schemes to the existing 20 properties at Northumberland Gardens, opposite Homebase and further homes at Rothbury Gardens and Hexham Gardens. 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.

Heritage and landscape

Importantly, there is great concern over the impact of these proposals on the Ward's listed structures of the Gillette Corner former factory and office building, the former bank, K6 telephone kiosk, cherub lights and former Centaurs Grandstand and Pavilion, Syon Clinic, former Pyrene Factory as well as non-listed Northumberland Estate maisonettes. The elevation of the Great West Road allows sight of some of these structures from vista openings on London Road and further south through Syon Park and across the River Thames. Many of these views would be irrevocably lost should developments of this scale be allowed.

Access

Transport and infrastructure are significant concerns at these sites. Understanding that these are within an 'opportunity area', some form of development would be welcomed but the balance in this situation is askew.

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 Transport Assessment stated that most of the sites are at PTAL 2 but *might*, after many unfunded and descoped projects, become a PTAL 3. Since the planning decision, further cuts to South Western Railway services from four to two trains per hour would cancel any forecast improvement.

There are no guarantees for the referenced and promoted train schemes. The vaunted West London Orbital has no TfL money and this scheme did not feature in anyone's manifesto during the 2021 London Mayoral and Assembly elections. The proposed Southall Link to Crossrail also has no money rendering the time frames set out as optimistic. With such proposed development densities, we would not, in the least, regard this a sustainable development. The number of cycle storage 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 at present.

While the developers may propose limited car parking at these 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. This cannot really be accepted as part of a green recovery when greater congestion will happen if these schemes are approved, the representations from Hounslow Cycling seem to agree.

It is also more than worth telling from the report that TfL do not believe nor trust the developer on their suggested number of servicing trips for this site, leaving neighbours, residents, pedestrians and other road and footway users 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 will be in excess of the pre-Covid baseline in 2025; that this scheme, if approved, would begin to be occupied at that point yet it appears this modelling has not been considered. Traffic reports were carried out in pre Covid scenarios; car use has shot up dramatically in the past year so this modelling no longer paints a true and accurate picture of the local road network and its air quality.

Osterley and Spring Grove Ward currently has just over 13,400 residents, a combination of these proposals will almost increase this by 50% without the required capacity to cope. The proposed developments are too big, the equivalent of landing something with a population the size of Frimley here in Isleworth.

Travelling by tube in a normal year from Osterley Station or indeed Boston Manor, commuters are familiar of waiting at the platform trying to board London bound Piccadilly Line trains, with each one arriving at full capacity. That base line is estimated to increase with the potential of 4,000 people trying to get on; or similarly, travelling towards Waterloo from Syon Lane.

Social infrastructure

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. While this is aspirational it is often not realised in practice.

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 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.

Some form of development at these sites would be acceptable 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 minutes, the nearest dentists 18 minutes and these are all over subscribed.

In 2025 no councillor would honestly be able to tell their constituents why they cannot get a GP appointment or school place because this inadequate scheme did not provide the proper infrastructure.

The developer proposes a significant under provision in communal amenity space at the Homebase site of just at 4,928 sqm, considerably 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. 2,370 sqm of play space should be provided for 240 children, yet just 500 sqm less than that. Strangely, the developer considers it acceptable to make up provision over half a mile away on the other side of the railway track, into Brentford.

We should also add that there has been absolutely no discussion with Osterley and Spring Grove Ward Councillors nor our residents on any amenity needs or suggestions for legally agreed community provisions arising out of these developments. We would argue s106 contributions should be directed towards improvements at Osterley Park or Jersey Gardens, much closer to the proposed 1,600+ units Tesco site.

In conclusion

We as local Ward Councillors believe this scheme is not right in its current form. We ask the Inspector to strongly recommend to the Secretary of State that he should insist that the developers 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. The proposed high density at these locations 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. 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, has been proposed by Councillors and the community and this is something we believe could be of merit, if the consent were to be upheld.

Through various interactions of the Local Plan there has been local consensus formed that there should be no developments higher than six storeys by established 1930s developments or more than 10 storeys within the Great West Corridor proper. While we appreciate that there is significant housing pressure meaning local wishes cannot always be met in their full, however we feel the dis-benefits of this current scheme outweigh the positives and the scheme should better reflect local wishes at this key site. We would hope that, the evidence presented at this Planning Inquiry will confirm what many other ordinary folk will, that very high buildings do not make for sustainable and peaceful communities.

There could be alternative and more in keeping schemes to submit but these have not been considered by the applicant.

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, preferably very much amended, in this most sensitive area, more stringent conditions are required, not least a 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; a Grampian Condition. We ask that the condition is tied in to all of these, 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 guaranteed not to disturb residents on Northumberland Estate, Syon Lane, Jersey Road, Wyke Estate and Great West Road.
4. A s106 legal agreement to endow an upfront 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. A s106 legal agreement of no less than £1m to support improvements to Jersey Gardens and £1 m for Osterley Park.

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.

As Ward Councillors, we are not against any development, but are averse to schemes that are not fit for the area, for the needs of the local residents. Representatives should expect the best for their residents and the future occupiers of any homes developed. We should not settle for less, and urge support for a development in a location which would be above sufficient in terms of quality and the infrastructure to support it.

Wishing you an agreeable Inquiry and pleasant spell in this part of the borough.

Thank you.

Yours sincerely

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

Tony.Louki@hounslow.gov.uk 078 6678 4580
Unsa.Chaudri@hounslow.gov.uk 073 7553 2063
Richard.Eason@hounslow.gov.uk 079 7670 2950