

**OBJECTION TO THE ADDITIONAL DOCUMENTS SUBMITTED IN JANUARY 2021 re:
PLANNING APPLICATION TO REDEVELOP THE HOMEBASE SITE, SYON LANE, TW7 5QE
Ref: 00505/H/P19, P/2020/3099**

Objection submitted by the Osterley & Wyke Green Residents' Association (OWGRA), February 2021
(to be read in conjunction with previous objections submitted by OWGRA in November 2020)

1. SUMMARY

Energy & Sustainability

- The target for Zero Carbon and other energy saving measures have been improved to an estimated 51% (Homebase site) and 59% (Tesco site), but they still fall significantly short of achieving Zero Carbon.
- The shortfall in achieving Zero Carbon emissions is mitigated by the developer paying into L B Hounslow's Carbon Offset Fund. However, the Carbon Offset payment is meant to be adopted, only as the very last resort, if all other carbon saving solutions have been exhausted and could not be implemented. There is no evidence that this has been done.
- The developer's shortfalls of 49% and 41% occurring in 2021, are at a significant variance with London Borough of Hounslow's pledge to be Carbon Neutral by 2030.
- Solar roof-mounted panels have now been proposed. In the absence of convincing information, it is assumed that the solar panels will conflict with the beneficial use of the proposed rooftop landscaped areas and their local environment. This is unacceptable and the true amount of green space provided needs to be recalculated.
- There is no information about exploiting the recycling of rainwater and greywater to deliver energy savings and reduce water demand.
- There is no salient and specific information provided on future proofing and impact of climate change, based on published data.
- There is no information on the impact of COVID-19 on environmental and building design, including well-being issues, etc. Single aspect flats do not allow natural air flow.

Transport and Linked Vision

- The only significant changes proposed are some minor tweaks to the layout of the north-south pedestrian and cycle crossing of the eastern side of Gillette Corner, which is wholly inadequate. A number of options are proposed, some of which would retain the underpass (removing the underpass would allow for widening of the road). Signalled pedestrian/cycle crossings are needed across all 4 arms of the junction, not just across the 2 arms of the A4.
- The developer is still insisting that traffic volumes will decrease at Gillette Corner, but we disagree. The reasons given for reduced traffic lack logic.
- We still say that Gillette Corner needs to be reconfigured to make it safer for all users of the junction (vehicular traffic, pedestrians and cyclists). The right hand turns from Syon Lane on to the A4 would remain dangerous (not controlled by filter light).
- Altogether these measures are needed to ensure compliance with the Mayor's Healthy Streets and Vision Zero policies.
- Where are the improvements to infrastructure? Only one in four properties would have a parking space meaning that most of the new residents would be relying on public transport, which is poor (PTAL 2) and already overcrowded. The only improvement proposed is a direct bus route from Osterley to Ealing Broadway. There is no prospect or funding for the much-needed Southall Rail Link (which would connect Osterley to the Elizabeth line at Southall from a new Golden Mile station), and the West London Orbital (which would connect the Hounslow Loop going through Syon Lane station and Brentford to the Overground at South Acton).
- In accordance with London Plan policy, the lack of good transport connections and infrastructure should mean that such a densely populated development should not be permitted on this site.
This is in addition to the fact that there is no close town centre as required for tall buildings.

2. CONCLUSION

Given these concerns, it does not seem to be possible to provide such a large Tesco store within the constraints of the site along with such tall and densely packed blocks of flats so that the proposals sit satisfactorily with each other. The scheme would therefore not work either for Tesco users nor for the flat dwellers above. The energy, sustainability and transport changes proposed in the new documentation, fail by a large margin to deal adequately with the major concerns expressed by OWGRA and local residents in autumn 2020.

Therefore, we maintain our original objections and fully support the views of the Hounslow Design Review Panel. This application should be refused. We maintain our belief that a smaller and greener scheme, at a much lower height and density, would be an appropriate solution, provided it is preceded by completing all transport and roads infrastructure necessary to fully support it.

3. INTRODUCTION

OWGRA notes that a quantity of fresh documents has been added to the LBH planning website under reference P/2020/3099 including a number of changes to the application listed in the WSP letter of 21 January 2021, as well as comments from the Hounslow Design Review Panel dated 28 January 2021.

Sustainable Regeneration for Sustainable Communities

OWGRA wants, and will fully support, proposals for a sustainable regeneration scheme that will enable and support sustainable communities. The current proposals do not achieve this, and for these fundamental reasons we are strongly opposed to them.

Sustainable communities are strong, inclusive communities which have attractive, safe places where people want to live, work, play and socialise, and to nurture their children as they grow up. Places that facilitate their good health and well-being. For new developments this will require integration of the new community and the existing community in the wider area.

This requires sustainable regeneration schemes that deliver sustainable high-quality homes, complemented, supported and enabled by appropriate social, green and physical infrastructure with sufficient capacity and quality. Failure to grow the capacity of this infrastructure in pace with new development will increasingly undermine the sustainability of the new community and the existing community in the wider area.

Social infrastructure must deliver the necessary additional capacity of social facilities and the services they provide, including health, education, policing, fire services, cultural, retail (including cafes, restaurants and bars) and community interaction facilities and services.

Green infrastructure must deliver ample, well-maintained open spaces that are always accessible to the wider community (not just new residents), with soft landscaping, water features, play areas, among other things.

In addition to physical infrastructure, it is vital to have digital infrastructure, utilities infrastructure and necessary transport infrastructure. The transport infrastructure must deliver good Public Transport Accessibility Levels (PTAL) and access to local services, all required to enable sustainable regeneration for sustainable development and sustainable communities. Tall buildings, like those in the applications, require a high PTAL. The current PTAL is 2 with no real prospect of it being raised to the levels required. It should enable and encourage the greatest use of sustainable public transport modes, and enable and encourage active walking and cycling modes. Developments should be integrated with local transport facilities, including local roads, in a way that will mitigate development impacts and enhance road user experience and safety, in particular pedestrians and cyclists.

OWGRA wants to support new developments on the Tesco and Homebase sites, but for that they will need to satisfy the following:

- 1. Buildings:** Low-rise buildings having a character that respects the local 2-storey residential buildings, and the Grade II Listed Gillette building.
- 2. Quality of Residential Units:** Dwellings that are double aspect to support healthy living, by promoting through natural ventilation and good daylight. Homes with an increased number of bedrooms are essential to respond to Hounslow's housing needs and expected rise in quality expectations. It is fully recognised, however, that homes are badly needed in Hounslow. This is supported by OWGRA, but not to the detriment of short- and long-term benefits for new and

existing residents. The area enjoys suburban qualities that are inclusive, and the vast majority of residents wish to maintain it for the ultimate benefits of this and future generations.

3. **Public Transport & Roads Infrastructure:** It is clearly necessary in the context of a major housing/commercial development to deliver improvements to the public transport & road infrastructure to meet the needs of the new development. Such improvements should precede, or at the very least be implemented simultaneously with, any major development.
4. **Sustainability, Climate Change and Future Proofing:** Further improvements to the developments' credentials are needed, including those dealing with Carbon Neutrality and implementing healthy living standards. This approach should constitute a step-change from the status quo, with additional measures and features that are verifiable at the planning stage and maintained through to project completion, via a co-ordinated input from architects, engineers and specialists. All this should be fully embedded in the overall design.
5. **The “Publication London Plan 2021”:** Compliance with the letter and spirit of this document is essential. Compliance should influence all aspects of the developments that impact on people's lives, including the environment and the availability of adequate public transport and road infrastructure, to support each incremental stage of the developments.
6. **Secretary of State Directive:** The Directive requires that planning proposals should empower residents to influence developments with emphasis on "Beauty, Quality, and Design". They should also ensure that all new suburban developments fully respect local heritage and ensure that residential developments are inspired and positively influenced by Georgian heritage on vernacular aspects and quality of homes.
7. **COVID-19:** This critical and long-term issue must be addressed. We need to learn the relevant lessons of the pandemic, particularly with regard to its environmental and well-being aspects, associated with the layout and qualities of dwellings, heights of buildings, qualities and quantum of landscaped areas.
8. **Hounslow Design Review Panel:** The HDRP's advice and recommendations (dated 28 January 2021) about the two developments should be fully accepted and implemented.
9. **Circular Economy:** Full consideration should be given to retaining the existing Tesco store and re-configuring the site layout to integrate residential units, as proposed by Brentford Community Council. This alternative would greatly benefit current and future residents and would alleviate many of the critical traffic issues.
10. **Community Facilities:** The Homebase site should provide a much-needed health centre and leisure facility (including swimming pool, gym, sports hall, etc), that would benefit both existing and new residents. Recent government advice and COVID-19 issues have accentuated the importance of such facilities.

There are also fundamental questions that have not been addressed and require answering as soon as practically possible:

- a. **Required Improvements to Roads and Public Transport** (e.g. Gillette Corner junction, Piccadilly Line, existing railways, new railways): These improvements are uncertain, because there are no available budgets and no firm timescales that have been agreed for their implementation.
Question: Can the developer, with advice from L B Hounslow, provide information about any committed budgets and firm timescales for implementing all new and improved road and rail infrastructure?

- b. **Traffic Assessment:** The results of the Traffic Assessments remain unconvincing, particularly with respect to traffic volumes.
Questions: Who will be responsible for monitoring the practical impact of the developments on public transport and roads, and make appropriate recommendations for prompt implementation? Who will be responsible for paying for and implementing any additional improvements and measures to improve conditions?
- c. **The London Plan:** It states that no new development should commence, prior to completing all necessary improvements to roads and public transport. Will L B Hounslow be responsible for enforcing this restriction?
Question: Can this be confirmed by L B Hounslow?
- d. **Phasing of Developments:** It is clear from the "Publication London Plan" that the quantum of any development must be linked to the prior completion of necessary improvements to roads and public transport infrastructure. Hence, developments must be planned to account for the phased completion of all necessary improvements.
Question: What is the developer's strategy and potential scenarios of development that are envisaged to address this critical issue?
- e. **Roads and Public Transport Improvements:** As and when these are in place, it is assumed that L B Hounslow will be responsible for authorising the appropriate quantum of development to be built, to match actual improvements in capacity.
Questions: Can this be confirmed by L B Hounslow? Who will be responsible for any potential mismatch between development and infrastructure, including any financial and operational consequences, given that third parties might be involved as services providers?

Great West Corridor (GWC) Review

There is no doubt that both the Homebase & Tesco proposals are significant departures from the existing development plan framework (the 2015 Hounslow Local Plan, etc). We understand that LB Hounslow still hopes that the GWC Local Plan Review will be subject to Public Examination this year, perhaps at some point during the summer months. The intention is that the Plan will be adopted by LBH before the end of 2021.

From the inspectors' initial questions to LBH, it is clear that they have a number of fundamental concerns. One of the issues that appears to be near the front of their minds is that they may wish to thoroughly examine the basis of the individual site allocations. This would include the Tesco and Homebase sites.

It would therefore seem eminently sensible to defer any decisions on these sites until the process of Public Examination of the GWC Review is complete.

4. DETAILED OBJECTIONS

OVERALL FOOTPRINT

The proposed Tesco store, the supporting infrastructure and servicing bays cover an almost total use of the ground floor footprint and leave little space for future residents, pedestrians, cyclists and store customers to use the remaining space safely on the edges of the site and within the road network (OWGRA objection page 13). **The Tesco development footprint is a fundamental issue which needs to be addressed before any other issues are considered.** The overall footprint should be substantially reduced. There is nothing to indicate how any changes might be made to deal with existing and future shopping requirements, such as home delivery or click and collect, which could be expected to increase as the Tesco customer car park allocation will be reduced by a third.

FORM AND CHARACTER

There remain concerns about the quality of development above the podium though we note blocks D and E heights have been slightly reduced but they are still excessively high for reasons given elsewhere in this document. It is noted that some attempt has been made to improve the appearance throughout the blocks by using co-ordinated brick colours and coherent lines. The 17-storey tower block does not have adequate space around it and it merges with the 10-storey block next to it. The 7-storey blocks fronting Syon Lane are too close together and overshadow the podium gardens. The podium gardens on the fourth floor leave a blank frontage along Syon Lane so that together with the height of the buildings themselves create an overwhelming and unpleasant appearance for pedestrians at ground level and particularly for the residents opposite who would lose views of open sky too. (OWGRA objection, Nov 2020, pg 14-17). The substantially glazed Tesco façade remains a cause of concern not only architecturally but also due to hazards caused by glare. Energy efficiency is also an issue.

The **Hounslow Design Review Panel** suggests in its report that the building footprint should be set back further than is proposed by the applicant. The *Park Grand Hotel* at Lampton Corner is set back from the junction in such a manner, making it less imposing than if it was set closer to the junction as is proposed for the new Tesco store at the current Homebase site.

Figure 1. *Park Grand Hotel* at Lampton Corner (view from the A4 west)



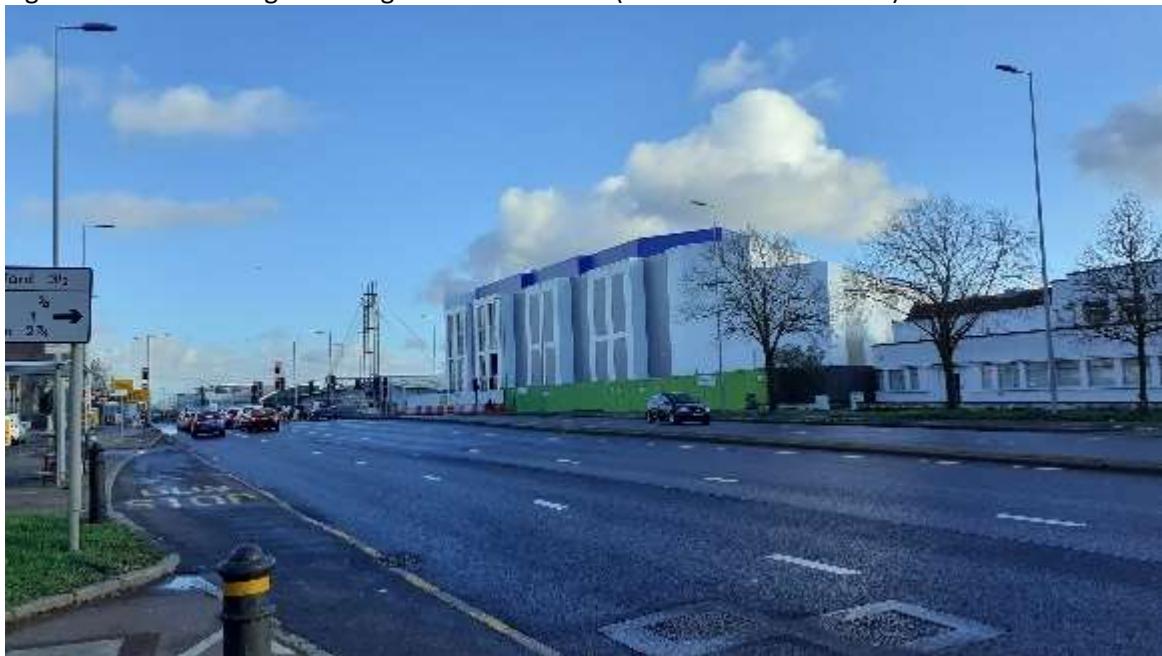
The Park Grand is 7 storeys high, nowhere near the height of the tallest block of 17 storeys proposed at the Homebase site, yet the photo below shows that 7-storeys is quite imposing at such a junction.

Figure 2. *Park Grand Hotel* at Lampton Corner (view from Lampton Road, south east)



OWGRA continues to state that 6-storeys is its red line for any developments in the Gillette Corner area. This is not a whim but is based on sensitivity to the area and to guidelines for tall buildings. The newly constructed Access Storage building at Gillette Corner (in the photo below) is 6-storeys. It was initially proposed at 14 storeys, then 11 storeys, **and eventually 6 storeys**, which complements the height of the Gillette building opposite, in this area of 2-3 storey housing to the west and similar heights of commercial buildings immediately to the east along the Great West Road.

Figure 3. Access Storage building at Gillette Corner (view from the A4 west)



The height of the Homebase tower is 33m, roughly equivalent to 11 storeys. If the proposed development goes ahead, there would be a 17-storey tower block just to the left of where the Homebase tower is now. This is completely out of place in this area of 2-3 storey housing with a maximum height of 6 storeys of the new *Access Storage* building.

Figures 4 and 5 are photographs of the 3D model that OWGRA commissioned from a professional model maker in October 2020 as the developer had not produced such a model, despite numerous promises to do so. OWGRA's model is accurate and to scale and based on Ordnance Survey maps and the information and dimensions given in the planning applications.

The height of the proposed development on the *Homebase* site can be seen in relation to the heights of the new *Access Storage* building and *Gillette* building in Figure 4 below, showing the new development to be considerably too high. A maximum height of 6 storeys would be acceptable and would complement the other buildings and not overshadow and overpower the 2-storey houses opposite.

Figure 4. Gillette Corner from the A4 eastbound



In Figure 5 below, the excessive heights of the proposed Homebase and Tesco developments show how they would dwarf the Gillette building, the new Access Storage building and the 2-storey houses opposite.

Figure 5. Gillette Corner from Syon Lane station



ASPECT OF RESIDENTIAL UNITS

Many units of accommodation are still single aspect due to the excessive massing of the proposals and wrapping units round the Tesco store. Single aspect dwellings do not promote healthy living and are not favoured as a result of COVID-19, and people's rising expectations of quality. In addition, the infill blocks next to block B exacerbate this. 'Semi-dual' units relying on views and air from doorways do not provide proper through-ventilation. **OWGRA agrees with the Hounslow Design Review Panel that the blocks should be reduced in mass, so that there are far fewer single aspect units.** Creating larger units of accommodation of 3 and 4-bed flats could also help resolve this and provide family-sized homes in the process. (See also sections 3 and 6 in Energy section below).

PUBLIC REALM AND LANDSCAPING

The **Hounslow Design Review Panel** finds the proposal for an amphitheatre public space at ground level welcome, but says it is inadequate to serve the development given its size. OWGRA agrees, particularly given its proximity to the Great West Road (GWR) and safety implications for a level crossing point. There is not enough space to accommodate both and it takes no account of potential public desire for a large safe space within which to congregate away from the GWR noise and pollution levels. The buildings need to be set back further to accommodate this proposal.

LINKED VISION

Compliance with the Mayor of London's policies, in particular Healthy Streets and Vision Zero, will require a comprehensive improvement to the local streets, in particular Gillette Corner junction, that will provide a safe and attractive environment for pedestrians and cyclists, thus enabling and encouraging more people to use these active sustainable modes.

REVISED ENERGY STATEMENTS - HOMEBASE & TESCO SITES

(Reports by Hodkinson Consultancy, January 2021)

Summary

- The target for Zero Carbon and other energy saving measures have been improved to an estimated 51% (Homebase site) and 59% (Tesco site), but they still fall significantly short of achieving Zero Carbon.
- The shortfall in achieving Zero Carbon emissions is mitigated by the developer paying into L B Hounslow's Carbon Offset Fund. However, the Carbon Offset payment is meant to be adopted, only as the very last resort, if all other carbon saving solutions have been exhausted and could not be implemented. There is no evidence that this has been done.
- The developer's shortfalls of 49% and 41% occurring in 2021, are at a significant variance with London Borough of Hounslow's pledge to be Carbon Neutral by 2030.
- Solar roof-mounted panels have now been proposed. In the absence of convincing information, it is assumed that the solar panels will conflict with the beneficial use of the proposed rooftop landscaped areas and their local environment. This is unacceptable and the true amount of green space provided needs to be recalculated.
- There is no information about exploiting the recycling of rainwater and greywater to deliver energy savings and reduce water demand.
- There is no salient and specific information provided on future proofing and impact of climate change, based on published data.
- There is no information on the impact of COVID-19 on environmental and building design, including well-being issues, etc. Single aspect flats do not allow natural air flow.

Comments made on the original submissions of the Energy Statements (Sept. 2020) are still applicable, unless they are revised or superseded, where indicated below.

Important Note on Relevant Planning Policy Documents:

The "Intend to Publish London Plan" (ItP) dated December 2019, has been approved by GLA's Mayor of London in December 2020. It is now called "Publication London Plan" and carries a significant weight in Planning decisions. It is expected to be adopted by the Mayor of London on 2nd March 2021.

The reports submitted by the developer do not reflect this Planning Policy document, and still refer to the "Intend to Publish London Plan", despite the fact that it was expected to be in force shortly after its approval in December 2020.

Below are OWGRA's comments on the revised Energy Statements, dated January 2021 for both the Homebase and Tesco sites.

1. CARBON EMISSIONS

The target for Zero Carbon and other energy saving measures have been improved to an estimated **51%** (Homebase site) and **59%** (Tesco site), but they still fall short of achieving Zero Carbon. This shortfall is significant and disappointing, given that these large projects are being designed in 2021, and because other residential developments built since the mid-1980s have achieved Zero Carbon (e.g. BedZed Residential at London Borough of Sutton).

The shortfalls in Residual Carbon of 49% and 41% for the Homebase and Tesco sites, respectively, are still substantial, but can be reduced much further, by adopting the additional **Measures 1 and 2**, as highlighted below.

The shortfall in achieving Zero Carbon emissions is mitigated by the developer paying into L B Hounslow's Carbon Offset Fund. However, the Carbon Offset payment is meant to be adopted, only as the very last resort, if all other carbon saving solutions have been exhausted and could not be implemented. These have not been exhausted.

Suffice to say that the developer's **shortfalls of 49% and 41% occurring in 2021, is at a significant variance with London Borough of Hounslow's pledge to be Carbon Neutral by 2030.**

1.1 Residual Carbon Emissions

The residual carbon emissions for the Homebase and Tesco sites are estimated to be, respectively, **176 and 598 tonnes CO2 per year**, over 30 years. It is clear that the quantum of these emissions constitutes a very considerable harm to the environment.

Nevertheless, information is required about:

- How will the estimated carbon reductions be monitored and the necessary action taken, to ensure adherence throughout the project's design development phases, and right up to project completion?
- What provisions have been made to account for design development, including iterations and interactions within the design team, and other third parties involved in the project?
- Will the estimated carbon reductions, of 51% and 41%, be verified by a third party to ratify the carbon emissions in tonnes CO2 per year, used to calculate the payment into the borough's Carbon Offset Fund?

1.2 Payment into Carbon Offset Fund

The developer's calculated payment is based (incorrectly) on £60 per Tonne of CO2 per year, over 30 years. The current figure is £95, based on the "Publication London Plan" approved by the Mayor of London, which supersedes the "Intended to Publish London Plan". See "Important Note", above.

Homebase site (report, page 34, item 9.5)

The estimated residual carbon emissions of **176 tonnes CO2 per year** was used to calculate the payment of **£316,800**, based (incorrectly) on **£60, rather than £95** per tonne of CO2, over 30 years. At present, the estimated **176 tonnes CO2** should therefore attract the higher payment of **£501,600**, based on **£95 per** tonne of CO2, over 30 years.

Tesco site (report, page 33, item10.7)

The estimated residual carbon emissions of **598 tonnes CO2 per year** was used to calculate the payment of **£1,076,400**, based (incorrectly) on **£60, rather than £95** per tonne of CO2, over 30 years. Therefore, the estimated **598 tonnes CO2** should attract the higher payment of **£1,989,300, based on £95 per** tonne of CO2, over 30 years.

1.3 Renewable Energy & Extent of PVs Use

The new introduction of PVs (photo-voltaic cells) as a renewable energy source, under "Be Green", energy saving measures has resulted in reducing the estimated energy consumption by **only 2% for each site**. This contribution is critical. Hence the need to preserve it, or preferably to increase it.

The following information is needed:

- Will the location of the PV panels shade the landscaped areas provided at roof level?
- If yes, what are the alternatives?
- If no, what action will be taken to ensure that the correct areas and PVs angle of inclination are implemented at project completion?

Homebase site (report, page31, item 7.13)

It is noted that an estimated power output of **72.5 kwp** will be generated using roof-mounted PVs on some blocks. Clarification is required:

- Are these truly viable locations, architecturally?
- Will the PVs result in shading landscaped areas on roofs?

Tesco site (report, page 29, item 7.13)

It is noted that an estimated power output of **222 kwp** will be generated using roof-mounted PVs on some blocks. Again, clarification is required:

- Are these truly viable locations, architecturally?
- Will PVs result in shading landscaped areas on roofs?

However, **further energy savings could be achieved if additional PVs were to be added to viable locations, as highlighted under Measure 1 below.**

Further information is required about PVs, due to their critical effect on carbon emissions:

- How will the design and installation of PVs system be monitored and verified, to ensure that the estimated output in kwp is maintained and the necessary action taken?
- What provisions have been made to ensure adherence throughout the project's design development phases, and right up to project completion? Bearing in mind iterations and interactions within the design team, and other third parties involved on the project.
- Will the estimated kwp for PVs be verified by a third party, given its influence on carbon emissions in Tonnes CO₂, used to calculate the payment into the borough's Carbon Offset Fund?

Appropriate information is required about PVs integration into the architectural design, due to their critical effect on carbon emissions:

- How will PVs be incorporated visually and functionally within the architectural design to ensure that they do not conflict with the use and environment of roof landscaped areas? This information is essential and should be subject to verification.
- How will the critical angle for PVs output be maintained in all locations, to deliver their optimum performance?

Early and informed architectural and engineering attention is needed to deal with all of the above issues relating to PVs.

1.4 Potential for Further Reductions in Carbon Emissions

It is possible to further reduce Carbon emissions very substantially, by adopting two measures:

- **Measure 1: Increase the extent of PVs** (e.g. by exploiting more roof areas on the Homebase and Tesco sites, provided they **do not** conflict with landscaped areas on roofs). Extending the PVs areas would constitute significant addition to the much needed "Be Green" measures, to deliver "clean" energy required to serve the development. This measure is simple to implement and is strongly recommended to further reduce carbon emissions.
- **Measure 2: Examine and adopt the alternative solution of lowering excessive building heights and reduce the density of the development, to lower carbon emissions significantly.** The public consultation by the London Borough of Hounslow has generated overwhelming requests by residents for a solution that limits the height of the development to **6 storeys**.

Hounslow Design Review Panel (HDRP) has also raised the adverse effects of heights and density of the development, and their negative influence on environmental issues. This alternative carries very substantial environmental, sustainability and urban quality benefits. It would result in very appreciable reductions in carbon emissions for the lifetime of the development.

Measure 2 is strongly supported by the local community, Hounslow's Design Review Panel (HDRP), and other professionals within the building industry, who have become aware of the proposed development.

2. CENTRAL HEAT SOURCE

2.1 Heat Source use & performance

It is noted that the primary source for heating and hot water will be delivered by high temperature heat pumps, raising the water temperature from 30 deg C to 60deg C, in a single stage.

Clarification is required about the flow temperature within dwellings:

- Will 60 deg C be used as flow temperature for the heating circuit?
- If yes, will that result in very large radiators in dwellings?
- If not, will the heating water temperature be boosted, to allow the use of conventional radiators? Should this be the case, how will temperature boosting be achieved? And, what type of fuel will be used by boosting equipment?

Information is required about heat pumps due to their critical effect on carbon emissions:

- What are the capacities of the different air-based heat pumps used?
- What is the performance of the heat pumps? This is a key issue given the size of the carbon footprint of this large equipment installation.

It is noted on the Homebase site, that heat pumps are located on the roof of block C, and coupled with heat storage vessels in the energy centre in the basement of block C, which accommodates the gas-fired back-up boilers. Information is needed about:

- What type of heat storage is proposed?
- How will the Heat storage vessel be used to manage the load profile of the development?

2.2 Using gas-fired boilers as back-up

Two important issues arise which require clarification:

- It is understood that gas-fired boilers will be used **only as back-up, in case of emergency or heat pump failure.** Also, that the back-up gas-fired boilers are sized to deliver the full peak capacity of the heat pump installation.
How can a fall back-up facility using large gas-fired boilers be justified, given that a total failure of all heat pumps is unlikely, if scheduled maintenance and plant monitoring are in place, as stated in the report?
- Gas boilers are mentioned as a "back-up".
Why is a gas-led solution being adopted, given the decarbonisation of the grid and the reduction in carbon factors associated with electricity?

NOTE: Given the expected demise of gas-fired boilers in the very near future, the following issues need to be addressed and answered:

- What type of equipment will replace the stand-by gas-fired boilers?
- Who will pay for the costs of retrofitting? This will include, but not be limited to: stripping-out all redundant equipment and installations, purchasing and installing new equipment. (developer? / tenants? / management company?)
- Will all parties, including tenants, be made clearly aware of answers to the above, and any implications thereof in the short and long terms?

3. MECHANICAL VENTILATION IN RESIDENTIAL UNITS – ENERGY & OVERHEATING ISSUES

3.1 Energy issues: The extensive reliance on mechanical ventilation in the dwellings has a significantly **adverse effect on the carbon footprint**, due to the substantial size of the development. Natural ventilation has not been fully exploited. Avoiding single-aspect dwellings and amending the layout of many residential units is still possible. This will extend the benefits of natural ventilation to the many cases where noise and pollution are not critical.

NOTE: The revised Design Code states “A commitment to minimise single-aspect north facing dwellings and that all 3-bed plus homes should be dual aspect”. **This is considered to be too vague as a basis to proceed, given the size of the development and the need to reduce carbon emissions to an absolute minimum.**

It is noted, however, that the layout of some dwellings has been modified to allow natural ventilation, but this does not appear to be reflected in the planning drawings. Information needed:

- Do the architectural drawings reflect this proposed change?
- How many dwellings can benefit from this change?

3.2 Overheating issues:

In conditions where windows need to be shut, due to noise and pollution, overheating will occur, during mild / warm external air conditions. Information needed:

- How will this problem be resolved?

4. FUTURE PROOFING & CLIMATE CHANGE

No future weather data (i.e. 2050) has been analysed to future proof the design. It is critical that this issue is addressed and clarified:

- What will be done to ensure that overheating will not occur?
- What measures will be taken to mitigate overheating, given the design parameters associated with climate change?
- How will such measures be implemented?

5. COVID-19 - DESIGN ISSUES & ENHANCED STANDARDS

5.1 COVID-19 issues

COVID-19 issues and their repercussions on building design have not been taken into account. The Cabinet of the **London Borough of Hounslow has approved (Oct. 2020), a live strategy for a Green Recovery Plan** that informs both current and future actions, on how best to deal with issues related to the pandemic. The plan is designed to support the borough in having strong and ambitious Sustainability credentials.

National and International professional journals and magazines have published many technical papers and articles, dealing with the salient issues related to COVID-19. Information needed:

- What measures were taken to promote healthier and better conditions in the proposed development? (e.g. enhanced ventilation standards in indoor spaces, safe and appropriate outdoors facilities, etc.)
- How will they be implemented?

5.2 Enhanced Environmental Standards

Notwithstanding the COVID-19 issues, the current design proposals do not address the following standards, which are often adopted in the UK Building Industry.

It is reasonable to expect the design concept of buildings for such a major new development in 2021, to take on board, some or all, of the forward-looking and enhanced environmental standards.

These include:

- The “Home Quality Mark” standard.
- The “WELL” standard for multi residential, and other places of work
- The “Living Building Challenge” standard (flagship requirements).

The above standards are rapidly becoming a benchmark for complying with the words and spirit of true sustainability, not only for buildings design, but for the wellbeing of people that occupy them.

COVID-19 issues have hastened the adoption of the above standards.

Information needed:

- Will the above standards be implemented?
- How will they be implemented?

6. MITIGATION AGAINST RESIDENTIAL OVERHEATING & ARCHITECTURAL DESIGN (REPORT - APPENDIX F)

6.1 Raised Window Sills (Appendix F, page 24, items 5.7, 5.8 and 5.9)

Raised sill height is essential to reduce overheating, as indicated in Table 4. Information needed:

- Has this important change been incorporated into architectural drawings? Given its impact on overheating and carbon emissions.

6.2 Internal Dwelling Layout Changes (Appendix F, page 25, items 5.13 and 5.14)

The proposed changes to the dwellings’ layout are essential to improve natural ventilation and reduce overheating. Information needed:

- How extensively has this solution been applied?
- Has this important change been incorporated into the architectural drawings?

6.3 Extent of glazed areas (Appendix F, page 34, Table 10)

A glazing ratio of 35% is proposed. It is essential that this value is “frozen” and not exceeded, and thus incorporated in the final architectural design. Results in Appendix F do not appear to be reflected in the architectural drawings and design. This needs to be addressed and clarified:

- Has the 35% glazing ratio been incorporated into the architectural drawings?
- Has the proposed specification for solar controlled glass been adopted within the architectural design and included in the project costing?
- How will the above 35% be monitored to ensure it is adhered to, all the way right up to project completion?

7. WHOLE LIFE CYCLE CARBON EMISSIONS

The recommendations made do not appear to be project-specific. The following needs answering:

- Has an inter-active design dialogue taken place with key architectural and structural design members and cost consultant to confirm their buy-in to reduce whole life carbon emissions?
- How will recommendations be timely incorporated into the design, and be monitored to ensure their implementation?

8. FABRIC PERFORMANCE

8.1 Residential fabric performance (Homebase and Tesco sites)

Noted that the external walls “U-value” is 0.15 W/m²K. The following needs answering:

- Can the external walls “U-value” be **improved to achieve 0.18 W/m²K?** Given that it would yield substantial savings in carbon emissions, by the significant wall areas of the development.

8.2 Non-residential fabric performance – new Tesco store (Homebase report, page 24, item 5.25)

The Tesco store façade is substantially glazed, resulting in a significantly negative effect on carbon emissions. Also causing serious glare problems, which would affect the safety and well-being of people. A number of critical issues arise from this, and need addressing and answering:

Energy issues

The following needs answering:

- What can be done to reduce the glazing areas of Tesco to improve energy use?
- What glazing specification can be adopted for Tesco, to reduce heating and cooling loads?

Glare & safety issues

The large areas of glazing of Tesco will result in significant glare problems, which are a serious hazard to motorists and a source of great discomfort to pedestrians and nearby residents. This needs answering:

- What can be done to deal with glare issues on Tesco’s facade?

9. WASTE WATER HEAT RECOVERY

Waste water systems are extensive and offer a significant potential for heat recovery, to help in reducing carbon emissions further. This needs answering:

- What can be done to recover heat from waste water? The quantum of recovered heat could be substantial given the size of the development.

10. SPACE HEATING & HOT WATER – Major discrepancies

Homebase site: (Homebase report, page 20, Item 5.1)

Item 5.1 states: “It is assumed that heating and hot water is supplied by a communal gas boiler system etc.” This statement is at total variance with the proposal to use heat pumps for heating and hot water (page 27, item 6.9).

Tesco site: (Tesco report, page 20, item 5.10)

Item 5.10 states “It is assumed that heating and hot water is supplied by a communal gas boiler system etc”. This statement is at total variance with the proposal to use heat pumps for heating and hot water (page 25, item 6.6).

Clarification is needed regarding the major discrepancies above.

REVISED SUSTAINABILITY STATEMENTS - HOMEBASE & TESCO SITES

(Reports by Hodkinson Consultancy, January 2021)

Comments made on the original submissions of the Energy Statements (Sept. 2020) are still applicable, unless they are revised or superseded, where indicated below.

Important Note on Relevant Planning Policy Documents:

The “Intend to Publish London Plan” (ItP) dated December 2019, has now been approved by GLA’s Mayor of London in December 2020. It is now called “Publication London Plan” and carries a significant weight in Planning decisions. It is expected to be adopted by the Mayor of London on 2nd March 2021

The reports submitted by the developer do not reflect this Planning Policy document, and still refer to the “Intend to Publish London Plan”, despite the fact that it was expected to be in force shortly after its approval in December 2020.

Below are OWGRA’s comments on the revised Energy Statements, dated January 2021 for both the Homebase and Tesco sites.

1. BREEAM

Homebase Site:

Residential: It is noted that a full BREEAM Pre-Assessment was undertaken. It is predicted to achieve ‘very good’ rating (at 65.6%), but falls short of ‘excellent’ (at ≥70%). Given the current sustainability, climate change and Zero Carbon policies adopted by central and local governments, it is reasonable to expect that BREEAM “excellent” should be achieved at this stage. (Note: Policy EQ2 “all developments over 500 sqm should be assessed against BREEAM standards and meet a rating of ‘excellent’ as a minimum”).

Retail: It is noted that the new retail (Tesco) is predicted to achieve only a “BREEAM very good”, in contrast with “excellent” stipulated by Hounslow. It is understood that the assessment applies to shell & core construction. However, much improvement in BREEAM can be achieved. Response needed:

- **How can BREEAM be improved on the Tesco façade?**

Tesco Site:

It is noted that a full BREEAM pre-assessment was undertaken. It is predicted to achieve ‘excellent’ rating (at 73.1%)

Monitoring BREEAM (both sites), information is required:

- How will the estimated BREEAM ratings be monitored throughout the design and construction phases, to ensure that they are adhered to and delivered at project completion?

2. ENERGY & CO2 REDUCTION

Homebase & Tesco Sites:

Residential Mechanical Ventilation: The reliance on mechanical ventilation (even with heat recovery) has a significant and adverse effect on carbon emissions, given the size of development. Exploiting natural ventilation has not totally maximised, by amending the layout of all accommodation and avoiding single-aspect dwellings to promote through ventilation, wherever noise and pollution could not be mitigated.

The revised Design Code states “A commitment to minimise single-aspect north facing dwellings and that all 3-bed plus homes should be dual aspect”. **This is considered to be too vague, as a basis to proceed, given the size of the development and the need to minimise carbon emissions.**

- What is proposed to eliminate single-aspect dwellings?

- Are all 2-bed and 3-bed dwellings dual aspect?

3. WATER REDUCTION / RECYCLING:

Homebase & Tesco Sites

Sustainability measures are expected to include water recycling. It is therefore important to clarify this issue, given the extent of landscaped areas. Information required:

- Will rainwater and greywater be collected and recycled, to irrigate the landscaped areas of the development?

4. CIRCULAR ECONOMY

This is an increasingly important aspect of sustainability, particularly in the current socio-economic climate. **Circular Economy, related to existing building assets, is not addressed in the Homebase and Tesco sustainability reports.**

Homebase Site:

Existing Building Asset:

- Firstly, the proposed demolition of the Homebase building, designed by the award-winning Sir Nicholas Grimshaw, has not been justified.
- Secondly, no study was undertaken to re-purpose. The site could easily accommodate a much-needed leisure facility (i.e. swimming pool, gym etc.) to serve the local community. This would also be greatly valued by future residents.

Comprehensive answers are required.

Tesco Site:

Existing Building Asset & Site Opportunities:

- Firstly, the proposed demolition of the Tesco building has not been justified, given that it is a sound building which also offers a valuable facility to the local community in its present location and format.
- Secondly, no study was done to retain the Tesco store and introduce an appropriate multi-storey parking facility, to release space for the new development.

Comprehensive answers are required.

Homebase & Tesco Sites:

New Buildings: The statements made about the circular economy do not appear to be project-specific. Answers are required:

- Has an inter-active design dialogue taken place with key architectural and structural design members, to ensure that recommendations will be timely incorporated into the design?
- How will recommendations be monitored and action taken, to ensure that recommendations regarding the circular economy are implemented?

5. TRANSPORT & LOCAL AMENITIES

Homebase & Tesco Sites:

Accessibility to Local Amenities: car ownership is envisaged to be low and there is ‘poor’ public transport provision. As an absolute minimum, **amenities should be easily accessible locally, but this is not the case**, as can be shown in the table below.

Effect of COVID-19: since the COVID-19 pandemic and the consequent increased levels of working from home, the concept of 15-minute neighbourhoods has become a laudable approach of life for cities in the future, where local facilities should be located within a 15-minute walk from home.

The sites of the proposed Tesco and Homebase developments **do not fulfil the 15-minute rule** in many instances, as can be seen in the table below. **People would be compelled to make a journey by some means of transport in many instances, and this has not been taken on board.**

Public Transport:

This is a very critical issue. For details refer to OWGRA's comments on Transport Assessment.

PTAL: (Homebase Site, report page 31, item 13.8- Tesco Site, report page 32, item 13.6):
The statement made about public transport is considered to be misleading. It just quotes figures for Public Transport Accessibility Levels (PTAL), without stating that they are classified as “poor”, and totally inadequate to support the significant increase in population generated by the proposed development.

Public Transport Services (Homebase Site, report page 31, item 13.7 – Tesco Site, report page 32, item 13.5):

The services mentioned (existing trains & tube) are already up to capacity, with no available funds for up-grading or improvements in the foreseeable future.

Additional and new train lines with superior capacities are necessary to serve the large increase in population (see comments on Transport Assessment). However, the **necessary funding required for this improvement is very substantial and will not be available in the foreseeable future.**

Healthy Streets Policy: Can you get to a library, post office, a park, a GP etc in just a 15-minute walk from current Tesco and Homebase sites? Sites walkable within 15 mins in green

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

Source: Google Maps

Avg: Times based on average adult walking speed

TRANSPORT ASSESSMENT

Summary

- The only significant changes proposed are some minor tweaks to the layout of the north-south pedestrian and cycle crossing of the eastern side of Gillette Corner, which is wholly inadequate. A number of options are proposed, some of which would retain the underpass (removing the underpass would allow for widening of the road). Signalled pedestrian/cycle crossings are needed across all 4 arms of the junction, not just across the 2 arms of the A4.
- The developer is still insisting that traffic volumes will decrease at Gillette Corner, but we disagree. The reasons given for reduced traffic lack logic.
- We still say that Gillette Corner needs to be reconfigured to make it safer for all users of the junction (vehicular traffic, pedestrians and cyclists). The right hand turns from Syon Lane on to the A4 would remain dangerous (not controlled by filter light).
- Altogether these measures are needed to ensure compliance with the Mayor's Healthy Streets and Vision Zero policies.
- Where are the improvements to infrastructure? Only one in four properties would have a parking space meaning that most of the new residents would be relying on public transport, which is poor (PTAL 2) and already overcrowded. The only improvement proposed is a direct bus route from Osterley to Ealing Broadway. There is no prospect or funding for the much-needed Southall Rail Link (which would connect Osterley to the Elizabeth line at Southall from a new Golden Mile station), and the West London Orbital (which would connect the Hounslow Loop going through Syon Lane station and Brentford to the Overground at South Acton).
- In accordance with London Plan policy, the lack of good transport connections and infrastructure should mean that such a densely populated development should not be permitted on this site.
This is in addition to the fact that there is no close town centre as required for tall buildings.

Sustainable Regeneration for Sustainable Communities (Fundamental Needs and Expectations)

OWGRA wants, and will fully support, proposals for a sustainable regeneration scheme that will enable and support sustainable communities. The current proposals do not achieve this, and do not earn the support of OWGRA.

Sustainable communities are strong, inclusive communities which have attractive, safe places where they want to live, work and play, and to nurture their children as they grow up. Places that facilitate their good health and well-being. For new developments, this will require integration of the new community and the existing community in the wider area.

This requires sustainable regeneration schemes that deliver sustainable high-quality homes, complemented, supported and enabled by appropriate social, green and physical infrastructure with sufficient capacity and quality. Failure to grow the capacity of this infrastructure in pace with new development will increasingly undermine the sustainability of the new community and the existing community in the wider area.

Social infrastructure must deliver the necessary additional capacity of social facilities and the services they provide, including health, education, policing, fire services, cultural, retail (including cafes, restaurants and bars) and community interaction facilities and services.

Green infrastructure must deliver ample, well-maintained open spaces that are always accessible to the wider community, with soft landscaping, water features and play areas.

Physical infrastructure must include necessary digital infrastructure and necessary transport infrastructure. The transport infrastructure must deliver high Public Transport Accessibility Levels

and access to local services, all required to enable sustainable regeneration for sustainable development and sustainable communities. It should enable and encourage the greatest use of sustainable public transport modes, and enable and encourage active walking and cycling modes. Developments should be integrated with local transport facilities, including local roads, in a way that will mitigate development impacts and enhance road user experience and safety, in particular pedestrians and cyclists.

The following text focuses on the impacts of these two developments on the transport infrastructure and services, which is one factor critical to the achievement of sustainable regeneration for sustainable communities.

Strategic Transport Infrastructure

As stated previously, the low Public Transport Accessibility Levels (PTAL) of these two development sites (Tesco 1b/2 and Homebase 2/3 – see Appendix A) demonstrate the poor connectivity that will simply not support the scale of high density developments that is proposed for these sites. This is a planning issue of strategic importance worth repeating, as it may be easier for those authorities under pressure to deliver housing to overlook or underestimate this issue. **The provision of adequate public transport connectivity along with adequate facilities for active walking and cycling modes is one of the critical success factors for sustainable regeneration and sustainable communities.**

Major developments of this proposed huge scale and density are typically developed around or close to high-connectivity public transport hubs / multi-modal interchanges, such as those in Central London and to some degree the Metropolitan Centres in wider London. Such transport hubs are served by multiple public transport modes and routes, with good walking and cycling connections and facilities, providing a PTAL much closer to or at the maximum PTAL 6b. Over time the availability of suitable sites in Central London and the Metropolitan Centres has diminished, driving high density developments into the suburbs, to sites with lower PTAL levels such as these two sites, where residents will have a much greater dependency on car usage and thus car parking provision. With current poor PTAL levels at these sites car parking provision is totally inadequate for a development of this size.

Thus, with regard to these two large-scale high-density developments, major investments are needed to deliver strategic transport connectivity infrastructure, in order to increase these PTAL levels to an appropriate level, as identified for the Great West Corridor Opportunity Area eg the mooted rail links, A4 junction improvements, Piccadilly Line upgrade. These public sector transport investments are neither funded nor committed, with the current economic climate and pandemic offering no certainty about future funding.

The Publication London Plan (issued by the Mayor 21st December 2020; approved by the Secretary of State 29th January 2021) now formally identifies the **Great West Corridor Opportunity Area**, set in the context of the Elizabeth Line West Catchment Area (see Appendix B).

However, as is shown in London Plan Figure 2.2 (see appendix B) the Opportunity Area Planning Framework Process shows that the Great West Corridor Opportunity Area is ‘Nascent’ ie: in the first / earliest stage, where development potential is merely identified, and infrastructure requirements are merely at “Options Appraisal” stage – **thus neither “Planned” nor “Planned and Funded”**.

Policy SD1 Opportunity Areas of the Publication London Plan states that, to ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will, among other things, provide support and leadership for the collaborative preparation and implementation of planning frameworks that:

- set out a clear strategy for accommodating growth

- assist in delivering specific infrastructure requirements that unlock capacity for new homes and jobs
- support regeneration

The inclusion of the Great West Corridor in the London Plan as an Opportunity area would render it eligible for this Mayoral support. But of course, now that TfL is in financial crisis, this Mayoral support may be an extremely long time in materialising.

The Publication London Plan states, under **GG2 - Making The Best Use of Land** that, to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must (among other things):

- prioritise sites which are well-connected by existing or planned public transport
- proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling

The Publication Plan also states, under **Policy D2 – Infrastructure Requirements for Sustainable Densities**, (see Appendix C) that the density of development proposals should:

- consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels (*note that this does not include unfunded infrastructure*)
- be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).

Policy D2 also states, among other things:

- Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.

The Publication London Plan also states, under **Policy D3 - Optimising site capacity through the design-led approach**, that, among other things:

- Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities.

In summary:

- The Publication London Plan policies require transport and other infrastructure improvements (including social and green infrastructure) to be delivered to ensure adequate capacity in time for any development, and that until sufficient infrastructure capacity has been delivered, development will be constrained by existing infrastructure capacity, with phasing of delivery as necessary.
- The strategic transport infrastructure identified as necessary to enable these and other developments in the Great West Corridor Opportunity Area is neither “Planned” nor “Funded”, and there is no prospect of funding for the foreseeable future. So, as a matter of London Plan policy, development on the scale proposed for these two sites should not be permitted.
- LB Hounslow and the Mayor of London must work together with TfL and the other relevant authorities to assemble the necessary funding for the transport, social and green infrastructure, as a public sector duty. The financing and funding for this infrastructure will typically require a

- range of Value Capture mechanisms, of which the pooling of CIL contributions from all qualifying developments will be only one of the many sources needed. While CIL contributions are fixed by the statutory CIL rates, major housing developments such as these two developments will typically generate major financial returns on investment, even after CIL is included in the costs. An open-book commercial viability assessment would reveal the true profits, and the true ability of the developments to make additional s106 contributions towards the cost of this strategic infrastructure, over and above the cost of the relatively minor measures that have been proposed to mitigate the local transport infrastructure impacts.
- Other Value Capture mechanisms may include things such as growth in business rates, growth in transport fare-box revenues, parking revenues, workplace parking levies, development gains (from publicly owned assets) and government / Mayor of London grant funding (eg Housing Fund infrastructure contributions).
 - However, it will surely be a very long time, many years beyond the current planning decision timetable for these two major developments, before this financing and funding assembly can be achieved, given the current pandemic and its economic and financial consequences and TfL's financial crisis. These strategic infrastructure projects will ultimately require substantive government support and grant funding. However, the nation-wide demands on government grant funding for infrastructure far exceed the availability of funds. And the government is prioritising infrastructure funding for the North of England.
 - Hence, in accordance with London Plan Policy D2 para C, "Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure." As classified in the London Plan, the Great West Corridor Opportunity Area infrastructure has achieved neither "Planned" nor "Funded" status.

Local transport connectivity

These developments should be required, through s106 planning obligations, to pay for mitigation of demands and impacts on local streets and public transport among other things, and to improve local connectivity, including public transport and active modes (walking and cycling), in accordance with the Mayor's Healthy Streets Policy among other things. In this regard, the current developer's s106 proposals for both developments fall short as follows:

- a. **Traffic Modelling for both developments** continues to raise serious questions as they continue to show no changes to total daily traffic flows, which is difficult to understand. The reduction in Tesco customer car parking spaces is not expected to materially reduce the Tesco customer trips, as the current car park is seldom at capacity. Also, displaced customer car trips may be maintained or even increased by drop-off / pick-up on the street at the new Tesco, causing congestion and public safety hazards. In any event, any reduction in trips will surely be outweighed by the additional residential trips generated by the two developments, including residential deliveries and car trips in the absence of better public transport.
- b. **Pedestrian & Cyclist accessibility across A4** – at the request of TfL, this has been considered for both developments. They have considered and modelled 4 options for crossings around the junction and concluded that Option 2 is preferred. But this does not provide the signalled pedestrian / cycle surface crossings on all 4 aspects of the junction, whereas Option 3 may achieve that.

However, this recommendation seems to be on the misapprehension that the roads hierarchy should give equal or greater priority to vehicular traffic. This is not consistent with the Mayor of London's Vision Zero and Healthy Streets Policies, under which priority should be given to active modes (walking and cycling) with the reallocation of road space as necessary. With regard to vehicular traffic flows through junctions, the Mayor and TfL put greater importance on the reliability and smoothness of vehicle journeys through signalled junctions than they do on actual journey times through these junctions, as long as traffic queues are consistent, remain as predicted and accommodated by the road layout. Also, the air quality impacts of traffic queues

are rapidly diminishing with the increasing proportion of electric vehicles and environmental idling controls on petrol and diesel vehicles.

The preferred solution should meet the Healthy Streets and Vision Zero objectives by providing signalled ped/cycle surface-level crossings on all 4 aspects of Gillette Corner junction, staggered if required by traffic signal phasing, thus providing much safer and easier crossings in all directions for pedestrians and cyclists. Removal of the pedestrian subway would avoid compromised widths of pedestrian refuges and carriageway on the parallel surface crossing. It appears that Option 3 may be capable of satisfying these requirements.

The preferred solution should also offer safer right turns onto the A4 from both north and south Syon Lane. There are no evident proposals to address this safety-critical issue.

Option 5 offers a staggered version of the Syon Lane Crossing just north of the junction, and Option 6 offers a staggered version of the A4 crossing on the eastern arm of the junction – both of these would be further improvements for pedestrians and cyclists, but are presented only as subjects for potential s106 obligations for future feasibility studies.

Option 1 proposes retaining the existing underpass with no parallel surface crossing. Options 2a and 4 propose retaining the existing underpass, with the addition of a parallel staggered surface crossing, but this requires compromised widths of carriageway lanes and pedestrian/cycle refuge. So none of these options are desirable.

The existing north-south pedestrian underpass on the eastern side of the junction may be considered by some as adequate, but for many it may be considered as a personal security risk and unwelcoming environment, especially at night when there are few people around. The developer has proposed cosmetic enhancements which will not change this perception.

c. **Homebase Site s106 Heads of Terms;**

The only transport provisions are:

- Additional pedestrian crossing to require assessment of a staggered pedestrian crossing across the southern arm of the Great West Road junction
- Highway works to Great West Road Junction – additional lane on the A4 eastbound right turn into Syon Lane, to provide better access to the development
- Public realm improvements between the Homebase and Tesco sites.

d. **Tesco Site s106 Heads of Terms:**

The only transport provisions are:

- Incorporation of a 4m segregated cycle / ped route along Syon Lane - which is an improvement on the previously proposed 3m shared ped/cycle route
- Introduced flexibility for alternative bus stop / turnaround facilities
- Introduced flexibility for the location of the mobility hub.
- There is a non-specific obligation ‘relating to the investigation and assessment of a staggered pedestrian crossing across the northern arm of the Great West Road Junction as a variation to Option 3 at a future date’. This ‘recognises that TfL and LBH may in future be keen to deliver wider improvements to pedestrian and cycle movements, including east-west movements along the Great West Corridor’. This does not inspire confidence.

The signalled access to this site off Syon Lane includes a right turn lane on Syon Lane northbound. This may possibly be adequate for normal Tesco shopping patterns, but peak shopping times, especially during the Christmas season and on rugby Saturdays (when Tesco Extra Twickenham is closed and Tesco Extra Osterley is much busier, plus rugby traffic along the A4, Syon Lane and Twickenham Road), may result in significant queues awaiting access to the site.

Taxi drop-offs

There is no detail in the planning application of how big the taxi drop-off/pick-up facility would be, as the only reference to this is in para 9.2.12 of the Transport Assessment:

“A taxi drop off / pick up facility will be located within the car park at Level 1 close to the Tesco travellators / foyer area.”

Station Capacity Assessments

The new Transport Assessment includes a Station Capacity Assessment for Osterley Station (tube) which is 1.2 mls away from the Homebase site (5 stops on the H91 bus), yet there is no Station Capacity Assessment for Syon Lane Station (Hounslow Loop, South West Railway) which is 0.2 mls from the Homebase site, nor is there any information given on the capacity and loading of the Hounslow Loop calling at Syon Lane.

Cycling Route

There is no mention in the developer's proposals about a cycling route along Syon Lane or Spur Road to join with Cycleway 9 along London Road and Brentford Town Centre.

Appendix A. Public Transport Accessibility Levels (PTAL)

Source: TfL WebCAT

Tesco Site PTAL

- Current PTAL: 1b – 2
- 2031 forecast PTAL: 1b-2 (no change)



Homebase Site PTAL

- Current PTAL: 2 – 3
- 2031 forecast PTAL: 2 – 3 (no change)

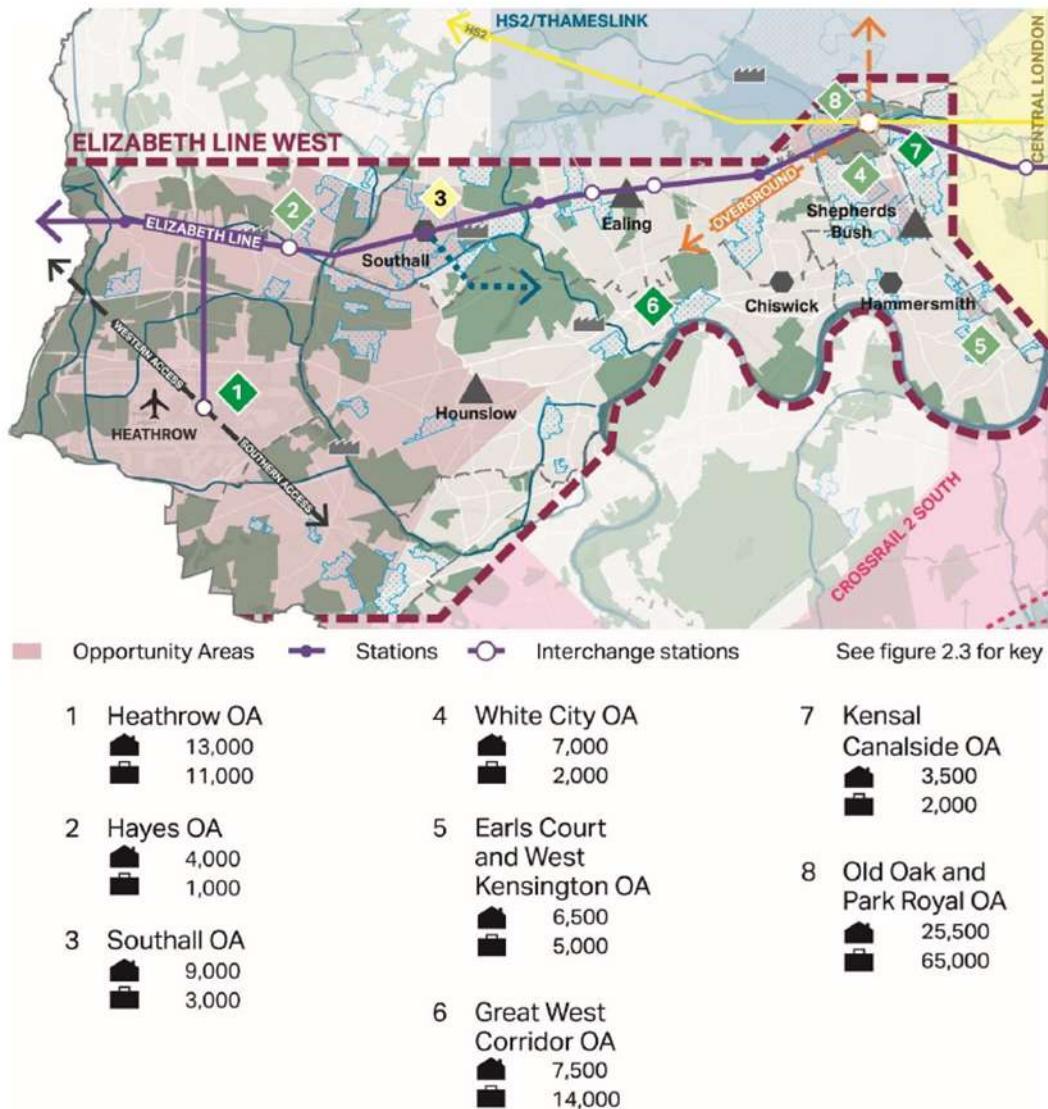


Note that TfL's 2031 forecasts take account of all public transport modes in London that are funded and are expected to be available in 2031: National Rail, London Overground, Tube, DLR, Tram, Buses - including principal public transport network improvements for schemes held in TfL's committed and funded transport investment programme. **It excludes potential enhancements that are not funded such as Crossrail 2, and the Hounslow rail links that have been identified as necessary to enable the delivery of developments in the Great West Corridor Opportunity Area.**

Appendix B. London Plan – Great West Corridor Opportunity Area

The Publication London Plan now formally identifies the Great West Corridor Opportunity Area, set in the context of the Elizabeth Line West Catchment Area – see London Plan figure 2.10 below, which also shows the indicative (additional) homes and jobs that may be realised.

Figure 2.10 - Elizabeth Line West



However, the Opportunity Area Planning Framework Process (see Publication London Plan Figure 2.2 below) shows that the Great West Corridor Opportunity Area is ‘Nascent’ ie: in the first / earliest stage, where development potential is merely identified, and infrastructure requirements are merely at options appraisal stage – thus neither “Planned” nor “Planned and Funded”.

Figure 2.2 - OAPF process diagram



Policy D2 Infrastructure requirements for sustainable densities

- A The density of development proposals should:
 - 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels
 - 2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).²⁶
- B Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.
- C When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

Policy D3 Optimising site capacity through the design-led approach

The design-led approach

- A All development must make the best use of land by following a designed approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.
- B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.
- C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2.

D Development proposals should:

Form and layout

- 1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
- 3) be street-based with clearly defined public and private environments
- 4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience

- 5) achieve safe, secure and inclusive environments
- 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 7) deliver appropriate outlook, privacy and amenity
- 8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- 9) help prevent or mitigate the impacts of noise and poor air quality
- 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character

- 11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique

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to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character

- 12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
- 13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy
- 14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

C Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.