

Planning Application for the Tesco Superstore site, Syon Lane, Isleworth TW7 5NZ

Ref: P/2020/3100

Comments by the Brentford Community Council and Brentford Voice,

6 November 2020.

Shane Baker,
Planning Department
London Borough of Hounslow
by email.

Dear Shane,

Planning Application P/2020/3100: Tesco Superstore Site.

View adopted by the Brentford Community Council and Brentford Voice.

We write to you with the joint views of the Brentford Community Council (BCC) and Brentford Voice (BV) and we request that you include them in your assessment of this application and report to members.

In preparing and adopting this paper BCC and BV members have had the benefit of a range of professional advisors including planners, architects, landscape architects, surveyors, climate change and energy advisers, and conservation architects.

The BCC and BV fully support the views adopted by OWGRA.

We have noted that a linked full application (P/2020/3099) for the Homebase site has also been submitted. Our views on that application will follow. Please read them together.

Summary and Recommendation

- 1 **The Brentford Community Council and Brentford Voice ask the Planning Committee to reject this application as a major over-development and departure from the approved development planning framework.**
 - 2 The detailed reasons for objecting to the application are set out below.
 - 3 We look forward to an early public inquiry into the draft Great West Corridor Local Plan Review,
 - 4 We note that the Mayor of London, in his letter to you dated 1st October 2019, commented that this site has the potential to provide additional B2/B8 capacity. The Mayor also objected to the minimum car parking floorspace. This site is one of the few within the Great West Corridor which is topographically flat and therefore would appear to be particularly suited to an employment-led proposal.
 - 5 **We support the principle of development on this site but we look for an appropriate alternative application which is consistent with the development plan and the guidance emerging for the Great West Corridor.**
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Planning Policy and Guidance

- 6 The Development Plan currently consists of the adopted Hounslow Local Plan (2015) and the London Plan (2016). We believe that although the site is undesignated in the Hounslow Local Plan, the density of housing development proposed in combination with the site's low Public Transport Accessibility Level, render this proposal as a departure from the development plan.
- 7 Policy SV1 of the Local Plan states that "We will work with residents and stakeholders to explore and identify the potential capacity for additional employment-led mixed use development along the Great West Corridor and coordinate its regeneration". Policy SV1 also seeks to:
 - (a) Identify the extent of the Great West Corridor;
 - (b) Determine the location and sustainable quantum of additional employment and residential development above existing Local Plan levels for implementation through new site allocations;
- 8 The National Planning Policy Framework (paragraph 48) gives guidance on the approach to be taken to emerging plans. It states that:

“Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given).

- 9 In the light of the guidance in the NPPF it is clear that only very limited weight can be given to unadopted policies in the *Intend to Publish London Plan* and in the current draft submission version of the *Great West Corridor Local Plan Review*. Objections to the latter plan submitted by Brentford Community Council, Brentford Voice, and others are both unresolved and significant.
- 10 The High Court judgement on the Chiswick Curve proposal (10 March 2020) set out clearly the very limited weight that should be attached to the unadopted plan for the Great West Corridor.
- 11 We note that the Regulation 19 version of the GWC Local Plan Review had two alternative approaches to the Tesco site. One envisaged the retention of the Tesco store with a "minimum quantum" of 350 homes while the second included the relocation of the Tesco store elsewhere in the GWC with a minimum quantum of 600 homes on the existing Tesco site.
- 12 The latest Submission Version of the GWC Plan now includes a minimum quantum of 1,030 homes on the Tesco site. This planning application proposes “up to 1,677 new homes”.
- 13 We welcomed the master planning approach, also strongly supported by the Mayor of London, which was adopted for the Regulation 19 version of the GWC Plan. However the currently proposed scale of development represents an almost threefold increase over the minimum quantum proposed in 2019 and a 50% increase over that proposed in the Submission Version of the GWC Plan. This planning application proposes 22% of the 7,500 additional homes which may be required in the Great West Corridor Opportunity Area as a whole. The current proposals for Homebase site (473 homes) represent an additional 6% of total indicative provision for the GHWC.
- 14 The 2019 GWC Review proposals were based on a Capacity Study and Masterplan (2019) which demonstrated the height and density limits which could be achieved without causing “harm” to the character of Brentford and Osterley as a whole and to listed buildings, conservation areas, the World Heritage Site at Kew, and other heritage assets.

- 15 It would appear that the current proposals for the Tesco and Homebase sites have paid no regard to the Capacity Study and Masterplan. The combined minimum quantum for these two sites was to be a total of 690 homes while the current proposals are for 2,150 homes, more than a threefold increase.
 - 16 If this pattern were to be repeated for other sites allocated in the GWC Local Plan the total number of homes to be provided in the GWC would be well in excess of 20,000 homes. We appreciate that this is an extreme scenario, but we would wish to be assured that mechanisms will be in place to ensure that the nominal target of 7,500 homes is not greatly exceeded.
 - 17 **Whilst we support the principle of development on this site we consider that it is a significant departure from the local development framework. Furthermore, this planning application represents a gross overdevelopment of a site in an essentially suburban location.**
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Community Consultation

- 18 Our concerns were consistently expressed to the applicants and yet the current proposals fail to address the outcome of meetings of the Community Liaison Group, feedback from public exhibitions, and an online survey carried out by the applicant. The main issues which remain unresolved are:
 - i. The height, massing and density of any proposed development. The scale of the proposed development is large by any standards, with an initial projection of 1,650 homes on the current Tesco site, and 500 homes above a new Tesco store at the Homebase site. While we understand that there is pressure on London councils to increase housing density we question the appropriateness of the sharp contrast this would be with existing housing in the area.
 - ii. The proposed housing mix is inappropriate as the area needs family-sized homes rather than studio, 1- or 2-bedroom flats. The space standards set by the London Plan are widely recognised as inadequate and even the London Mayor asks developers to exceed them.
 - iii. Delivery of infrastructure must go hand-in-hand with any development as the local infrastructure is already stretched e.g. transport, health centres, and play areas/facilities for children.
 - iv. Traffic: Gillette Corner is already at or over capacity and is an unsafe junction, so a new development cannot be feasible without major reconfiguration of Gillette Corner.

- v. Public Transport: the area is not well served by public transport (H91 and H28 buses, and Syon Lane station) and the H91 and train service are already very full at peak hours.
- vi. Pollution: pollution levels are already high in the area and frequently exceed legal limits.
- vii. Construction should be environmentally friendly and use sustainable materials.
- viii. The development should be zero carbon.

19 The proposals fail to address the fundamental concerns that have been raised by the community.

Affordable Housing and the Housing Mix

- 20 Policy SC2 of the Hounslow Local Plan seeks the maximum reasonable amount of affordable housing to be negotiated on a site by site basis with reference to the borough-wide target of 40%, and seeks a mix of 60% affordable/social rented and 40% intermediate tenures.
- 21 Draft Policy GWC2 of the Great West Corridor Local Plan sets a strategic target of 50% affordable housing on a site-by-site basis.
- 22 This planning application seeks to provide the absolute minimum of 35% affordable housing (36% by habitable rooms when combined with the Homebase site), as set out in Policy H5 of the *Intend to Publish London Plan*. This policy requires the applicant to demonstrate that they have taken account of the strategic 50% target in Policy H4 (Delivering affordable housing).
- 23 The applicant asserts that Policies H4 and H5 of the *Intend to Publish London Plan* have very significant weight and take primacy over the affordable housing policies in the adopted London Plan in the determination of strategic planning applications.
- 24 Irrespective of tenure we understand that the precise housing mix in terms of size will be fixed at the reserved matters planning application stage. However we note that the applicant currently proposes that the proportion of homes that will be studio, 1- and 2-bedroom units appears to be greatly in excess of that proposed in Draft Great West Corridor Local Plan Review. This planning application also appears to under-provide the proportion of 3- and 4-bedroom homes that was identified in the *Strategic Housing Market Assessment Update (2018)* commissioned by LB Hounslow.

- 25 This site is the only one within the Great West Corridor which is relatively pollution-free and close to schools, and therefore particularly suitable for family housing. The current proposals represent a missed opportunity for the provision of family homes needed in the GWC.
 - 26 The co-location of employment and housing uses is a very significant principle of the GWC Plan. This principle appears to have been rejected in the current proposals. The adjacent Sky premises are a very significant employer but this planning application contains no reference to consultation with Sky to assess employees' need for housing of a particular size and price. The benefits of such a consultation, including a reduction in the need to travel, would be very considerable.
 - 27 We are very disappointed to find that this application will not be tested for a late stage review of viability.
 - 28 **We are very concerned that the proposed affordable housing provision falls well short of policies in the adopted development planning framework. The mix of proposed dwelling types fails to reflect the need for larger family homes.**
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Heritage, Townscape and Visual Impact

- 29 Our detailed comments on these issues are set out in Annex 1.
- 30 The character of this part of Osterley and Spring Grove has been well recorded in the Urban Context and Character Study prepared by LB Hounslow in 2014, which should be the starting point for consideration of development proposals. This Study points to the general uniformity and permanence of scale, density, layout, building type, urban type, use and period within the area (Character Area B) and states that the area is unsuitable for tall buildings.
- 31 The north-western part of the site falls within the Osterley Park Conservation Area located immediately along MacFarlane Lane.
- 32 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 33 The applicant's *Planning Statement* asserts that "The heritage assets are conserved in a manner appropriate to their significance, in compliance with the NPPF, with Local Plan Policy CC4 and emerging Policy GWC5".
- 34 In this light it is hard to understand how the development of a part of the Osterley Park Conservation Area and the visual impact of this proposal as a whole can contribute to the conservation of these heritage assets.

- 35 In relation to Osterley Park Conservation Area, the *Planning Statement* (para. 11.1.14) states that “the relationship between these two parts of its identity is recognised in the *Conservation Area Appraisal*”. We have been unable to find a copy of the *Conservation Area Appraisal*.
- 36 Proposals in the Great west Corridor Local Plan Review proposals were based on a Capacity Study and Masterplan (2019) which demonstrated the height and density limits which could be achieved without causing “harm” to the setting and character of the listed buildings, conservation areas and other assets including Syon Park.
- 37 The GWC Masterplan and Capacity Study was supported by a Views Assessment Appendix. In relation to the Tesco site, this assessment concluded that an appropriate maximum height for tall buildings is 14 storeys (64 metres above ordnance datum/44 metres above ground level).
- 38 The parameter plans that accompany this proposal suggest that no less than 12 separate elements of the scheme will exceed 64 metres AOD, with the tallest element being 79.8 m. AOD (17 storeys).
- 39 The top of the clock tower at the Gillette building stands at 69 m. AOD (45 m. above ground level). The taller elements within the Tesco site would clearly have an adverse impact on the setting and character of the Gillette building.
- 40 In relation to Syon Park the GWC Views Assessment clearly concludes that a 17-storey building on this site would result in “a measure of detrimental impact”. We can find no satisfactory evidence in the applicant’s Heritage Statement that Historic England’s concerns, shared by LB. Hounslow, have been adequately addressed.
- 41 **We cannot agree with the applicant’s assertion, in their Heritage Statement that “the proposed development will therefore, on balance, preserve the setting of heritage assets and not cause harm to their heritage significance, and will bring significant public benefits”. We believe that these proposals would result in significant harm to heritage assets and that they would not be outweighed by the public benefits.**
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Transport and Accessibility

- 42 Policy SV1 of the Hounslow Local Plan seeks to coordinate the delivery of public and private investment in transport infrastructure throughout the Great West Corridor as identified in policy EC1”.

43 Policy EC1 of the Local Plan states that “We will expect development proposals to ensure that access to existing and future strategic transport connections is considered where appropriate, including through appropriate design; and

(l) Contribute to improvements to the strategic transport network where appropriate, consistent with the Local Implementation Plan and Infrastructure Delivery Plan, and the findings of Transport Assessments.”

44 The Hounslow *Third Transport Local Implementation Plan* (February 2019) states that “the Great West Corridor Opportunity Area is characterised by low public transport accessibility, particularly in the west, high traffic flow, and congestion on the A4 and other roads leading to severance and poor air quality, and lack of connectivity to local town centres”.

45 The Local Implementation Plan also highlights the importance of “funding to progress development of strategic transport schemes on and around the Great West Corridor Opportunity Area, for example the proposed Golden Mile rail station, and to support step free access at stations generally. A key aspect of this work will be supporting the development of the Local Plan Reviews for the two areas to ensure transport challenges and requirements remain at the heart of the planning process”.

46 The *Local Implementation Plan* promotes a number of interventions which are very significant in assessing the public transport implications of this proposal.

47 The Hounslow *Infrastructure Delivery Plan* (June 2019) states that “Much of the proposed development in the GWC plan areas is contingent on an improved transport network that eases congestion, reduces the reliance on private vehicles and promotes use of public transport and active modes of travel.”

Project	Approx. date	Indicative cost	Likely funding source	Comments
Southall – Brentford rail link and A4 public realm improvements	2020-2025	£100m	LB Hounslow, DfT, TfL and developer contribution	Facilitate improved access between Great West Corridor Opportunity Area and Elizabeth Line. Improved pedestrian and cycle facilities on and over the A4.
West London Orbital rail link	2020-2025	£400m	LB Hounslow, West London Alliance (WLA), TfL and developer contribution	Proposal 88 in MTS for delivering a new London Overground link between Hounslow & Cricklewood/West Hampstead via Old Oak Common.
Southern Rail Access to Heathrow inclusive of a station at Bedfont	2020-2025	£1000m	LB Hounslow, DfT, TfL, developer contributions and private financing	LB Hounslow's proposal also delivers a new station in Bedfont which will unlock significant regeneration opportunity

- 48 A significant conclusion of the *Great West Corridor Strategic Transport Study* (LBH and TfL, 2018) was that “To accommodate the scale of development growth proposed and to address existing and forecast challenges the study shows it is essential that new development across the area is brought forward in a carefully phased manner, in line with appropriate incremental improvements to the transport network”.
- 49 The *GWC Strategic Transport Study* also concluded that a combination of rail and bus packages will deliver the wider strategic public transport connectivity and accessibility that is necessary.
- 50 We find no evidence that this proposal makes significant improvements or contributions to the strategic transport network, nor to the objectives of the Transport Local Implementation Plan, or the Infrastructure Delivery Plan.
- 51 This proposal makes no specific references to the advantages, to Brentford Town Centre, of providing better connectivity from the site by foot, cycle, or public transport.
- 52 **We feel very strongly that improvements to public transport infrastructure in the Great West Corridor must precede, or at worst proceed in parallel with, the implementation of major development proposals. We therefore believe that this proposal is premature in advance of any clear practical and financial commitment to such improvements.**
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Design, Scale and Massing

- 53 Although it is apparent that a great deal of work has gone into the strategy for the site and its landscaping, there is no disguising the fact that the scheme is fatally compromised by over-development.
- 54 Over-development creates the following problems:
- The scheme will inevitably be extremely alien to its surroundings. Instead of the low rise family housing which adjoins the site, the proposal is for massive blocks of flats, with most of the amenity space at upper levels. It is difficult to see how this megastructure approach, which may work in city centres and major transport nodes, can be in any way compatible with the low rise suburban context.

- The block plans and sections indicate that the buildings will be very closely spaced, especially when their height is taken into account. This implies that the accepted standards of privacy, daylight and sunlight will be difficult to achieve on this site.
- Landscaping will also be compromised, as the space for it at ground level is so limited, given the footprint of the buildings. The ground level spaces will too heavily overshadowed for substantial planting to thrive. The reference to Osterley House as a courtyard precedent is disingenuous, as that building has a mere three storeys. The same properties can hardly be ascribed to a space flanked by multi storey blocks.
- Dwelling types are predominantly flats. The few houses which are proposed, appear to have their gardens at high level above a podium car park, hardly an ideal arrangement for a family with children.
- Despite the claims that north-facing single aspect flats will be avoided, the indicative plans show that this is unlikely to be the case.
- The podium car parking at ground, and presumably first floor, level is proposed to be fronted by apartments. While this is welcomed, as it avoids the dead frontages which are proposed on the Homebase site, it is achieved at the cost of the quality of those dwellings, which will be of necessity single aspect, and being surmounted by tall blocks of flats, will have the worst daylighting in the blocks.
- Amenity space is limited to the deck over the car park. Other developments of this nature have demonstrated that it is not possible to create high quality landscaping in such a location – the level of topsoil available makes it impossible to have substantial planting. The height of the deck above the prevailing ground level, and the very large blocks closely spaced above means that it will be a windswept space, in which conditions for plants and people will be unfavourable.

55 In summary, the ideas in the proposal would have merit if they were applied to a scheme containing 25% of the amount of accommodation. Most of the problems would disappear, and the site could be developed in a family-friendly, human-scaled environment that would harmonise with its surroundings.

The Parameter Plans

56 The parameter plans specify the parameters, constraints and restrictions within which the outline elements of the proposed development must be contained, in the

subsequent reserved matters submissions, so that the proposals remain within the scope of the Environmental Impact Assessment.

- 57 There may be some variation in the precise location of land uses and road layouts in the subsequent submission of reserved matters. Flexibility to accommodate any such variation is reflected in the parameter plans, where relevant.
- 58 Where this occurs, it is anticipated that the overall concept of the outline application development proposals will be maintained, and this will be demonstrated in the reserved matters submissions.
- 59 In reality the parameter plans that accompany this planning application “fix” the subsequent reserved matters application(s) in terms of the scale and layout of the proposal, including the height, width and length of each proposed building. The reserved matters application (s) would address only appearance, details of the means of access for all routes to and within the site, and landscaping.

We believe that particular consideration must be given to the parameter plans that accompany this planning application. Our experience with similar large-scale outline applications is that the parameter plans become almost immutable when a reserved matters application is submitted.

Energy and Sustainability

- 60 Section 3.12 of the applicant’s *Energy Statement* and the Whole Lifecycle Carbon Emissions Assessment (Appendix J) selectively quotes Policy SI 2 of the *Intend to Publish London Plan*. However the applicant neglects to state that SI2 C says that “Where it is clearly demonstrated that any zero-carbon target cannot be fully achieved on-site, any short fall should be provided... through a cash in lieu payment to the borough’s carbon offset fund”.
- 61 The *Energy Statement* has not clearly demonstrated that this development could not achieve lower carbon emissions without gas boilers. Instead, in section 6.7, it simply states that “it is not feasible for a communal system of this size and type to generate 100% of heat from heat pumps”. This runs counter to many other planning applications which are coming to Hounslow Council that do manage to do without gas boilers and thus substantially reduce their carbon emissions on-site. No argument has been presented why this particular development is any different to these other developments. It has not been clearly demonstrated that this development cannot reduce the emissions further on site, so a cash in lieu option as proposed in section 9.3 and 9.4 is not a valid option.

- 62 Sections 1.3, 4.1, 4.6, 4.9, 5.28, 6.20, 10.3 of the *Energy Statement* say that SAP 10 carbon emission factors will be used. But Appendix B uses SAP 2012 carbon emission factors. It is thus very difficult to follow through from Appendix B to where it is summarized in Appendix A. The applicant should be asked to re-submit Appendix C using the SAP 10 factors so that the *Energy Statement* can be scrutinized properly.
- 63 Section 9.3 of the *Energy Statement* uses £60 per tonne of CO², but this should be £95 per tonne of CO². (See section 9.2.8 of the *Intend to Publish London Plan*). Section 9.4 repeats the incorrect calculations by using £60 per tonne of CO² rather than £95 per tonne of CO². As above, the use of a cash in lieu payment of this sort is not valid unless it is clearly demonstrated that further on-site measures cannot be made to reduce emissions.
- 64 **The applicant should be asked to re-submit their Energy Statement using the SAP 10 factors so that their plans can be scrutinized properly. The applicant should be required to submit detailed evidence that it is not feasible to generate 100% of heat from heat pumps.**

Signed by:

Stephen Browne, Chair BCC

Denis Browne, Hon. Planning Advisor BCC

Martin Case, Chair BV

Jim Storrar, Planning Advisor BV

COMMENTS ON THE URBAN DESIGN AND CONSERVATION ASPECTS OF THE PROPOSALS

As an architect long familiar with the application-site and proposals for the conservation-based development of the adjacent Gillette Building site, I write in support of The Osterley and Wyke Green Residents Association in urging the Council to refuse the current application for Outline Planning Permission for the proposed residential development of the existing Tesco Site – bounded by Syon Lane, Macfarlane Lane and Grant Way – for the following reasons:

- The unjustified development of the Tesco site with grossly oversized residential buildings rising to seventeen storeys which, by virtue of their height will have a seriously damaging impact on the immediate settings of Banister Fletcher’s listed Gillette Building of 1936-1937 and the separately listed, 19th century cast-iron lamp-standards and lanterns from the Junior Services Club in St James’s Square in front of the Gillette Building, on the north-eastern side of Syon Lane to the south-east the application-site; on the setting of Walter Holden’s nearby listed National Provincial Bank of 1934-1935; and on the setting of the nearby listed former University College School Old Boys’ Club sports-stand to the north-west of the application-site, thereby resulting in substantial harm to their significance as designated heritage assets, and, most importantly, reducing the pre-eminence of the elegantly proportioned and detailed clock-tower of the Gillette Building in views from far and wide.
- The unjustified development of the Tesco site with grossly oversized residential buildings rising to seventeen storeys which, by virtue of their height, will have a seriously damaging impact on the immediate setting of the Osterley Park Conservation Area, to the north-east and south-west of Syon Lane, thereby resulting in substantial harm to its significance as a designated heritage asset.
- The unjustified development of the Tesco site with grossly oversized residential buildings rising to seventeen storeys which, by virtue of their height, are likely to have significant and potentially damaging impacts on views from the grade I registered Osterley Park, thereby harming its special interest and significance as a designated heritage asset.
- The unjustified development of the Tesco site with grossly oversized residential buildings rising to seventeen storeys which, by virtue of their height, are likely to have significant and potentially damaging impacts on views from locations within the Osterley Park and Grand Union Canal and

Boston Manor Conservation Areas, thereby harming their special interest and significance as designated heritage assets. And

- The unjustified development of the Tesco site with grossly oversized residential buildings rising to seventeen storeys which, by virtue of their height will harm the settings of both designated and non-designated heritage assets and the long-established, prevailing two-storey scale of the nearby residential area to the south-west of Syon Lane designated as an *Area of Special Character* in the Proposals Map (East), thereby reducing its significance as a non-designated heritage asset.

For these reasons the proposals are contrary to:

The following policies in the *Hounslow Local Plan, 2015-2030*:

Policy CC1 in relation to context and character, Policy CC2 in relation to urban design and architecture, Policy CC3 in relation to tall buildings and Policy CC4 in relation to heritage.

The following policies in *The London Plan: The Spatial Development Strategy for London Consolidated with Alterations since 2011 of March, 2016*:

Policy 7.4.B.a, c, d and e in relation to local character: the need for buildings, streets and open spaces to provide a high quality response that ‘has regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass’; that ‘is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings’; that ‘allows existing buildings and structures that make a positive contribution to the character of the place to influence the future character of the area’; and that ‘is informed by the surrounding historic environment’.

Policy 7.6.B. in relation to architecture: the need for buildings and structures to ‘be of the highest architectural quality; ‘be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm’; that comprise details and materials that complement, not necessarily replicate, the local architectural character’; and that ‘not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate’, and that ‘this is particularly important for tall buildings’.

Policy 7.7.B., C., D. and E. in relation to the location and design of tall and large buildings: the need to ensure that proposals for tall or large buildings should include an urban design analysis that demonstrates that the proposal is part of a strategy that will meet the criteria below, particularly if the site is not identified as a location for tall or large buildings in the borough’s LDF:

‘Tall and large buildings should a. generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access

to public transport; b. only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building; c. relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level; d. individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London; e. incorporate the highest standards of architecture and materials, including sustainable design and construction practices; f. have ground floor activities that provide a positive relationship to the surrounding streets; g. contribute to improving the permeability of the site and wider area, where possible; h. incorporate publicly accessible areas on the upper floors, where appropriate; and i. make a significant contribution to local regeneration’.

‘Tall buildings: a. should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference; and b. should not impact on local or strategic views adversely’. And

‘The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings’.

Policy 7.8.C. and D. in relation to heritage assets: the need for ‘development to identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate’; and for ‘development affecting heritage assets and their settings’ to ‘conserve their significance, by being sympathetic to their form, scale, materials and architectural detail’;

The following policies in the *Draft London Plan, 2019, Intend to publish version of December, 2019*:

Policy GG2 in relation to making the best use of land; Policy D3 in relation to optimising site capacity through a design-led approach; Policy D4 in relation to delivering good design; Policy D8 in relation to the public realm; and Policy D9 in relation; and

The following policies from the *National Planning Policy Framework of February, 2019*:

Paragraph 124. in relation to the desirability of creating high quality buildings and places and of effective engagement with communities throughout the planning process;

Paragraph 127.c) and d) in relation to ensuring that developments are ‘sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change’ and that developments ‘establish or maintain a strong sense of place, using

the arrangement of streets, spaces, building types and materials’ in order ‘to create attractive, welcoming and distinctive places to live, work and visit’;

Paragraph 128. in relation to the importance of early discussion about the design and style of emerging schemes with the local community – clarifying expectations and reconciling local and commercial interests, and working closely ‘with those affected by proposals’ in order ‘to evolve designs that take account of the views of the community’;

Paragraph 190. in relation to the need to take account of the particular significance of heritage assets affected by proposals in order ‘to avoid or minimise any conflict between the conservation of heritage assets and any aspects of the proposals’;

Paragraph 192. a), b) and c) in relation to the need ‘to take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic activity; and the desirability of new development making a positive contribution to local character and distinctiveness’;

Paragraph 193. in relation to the need to give great weight to the conservation of a designated heritage asset in considering the potential impact of proposed development on the significance of that asset, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance;

Paragraph 194. in relation to the need to ensure that ‘any harm to, or loss of the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’, and that ‘Substantial harm to or loss of grade II buildings..... should be exceptional’;

Paragraph 195. in relation to the need to demonstrate that substantial harm to, or total loss of significance of a designated heritage asset can only be approved if necessary to achieve substantial public benefits that outweigh that harm or loss;

Paragraph 196. in relation to the need to weigh a proposal leading to less than harm to the significance of a designated heritage asset against the potential public benefits of the proposal, including, where appropriate, securing its optimum viable use; and

Paragraph 197. in relation to the need to take account of the potential effect of a proposal on the significance of a non-designated heritage asset, and to apply a balanced judgement in weighing proposals that directly or indirectly affect non-designated heritage assets having regard to the scale of any harm or loss and the significance of the heritage asset.

In reaching my views, I have taken note of the documentation submitted in support of the application, including WSP’s three-hundred and twenty-five page *Planning Statement*; JTP’s

two hundred and fourteen - page *Design and Access Statement*; and KM Heritage's ninety-two-page *Heritage Statement*. In the absence of a suitably scaled model of the proposed development provided by the prospective developer, I have also taken particular note of the most useful 1:1000 scale model of the area commissioned by The Osterley and Wyke Green Residents Association showing the proposed development of both the Tesco and nearby Homebase sites in their setting.

I have also had regard to the relevant guidance contained in the *National Planning Practice Guidance – Historic Environment* of July, 2019:

Paragraph 006: in relation to 'significance':

Paragraph 007 in relation to the importance of 'significance' in decision-making;

Paragraph 008 in relation to the means of avoiding or minimising harm to the significance of a heritage asset;

Paragraph 013 in relation to the setting of a heritage asset; and how it can be taken into account;

Paragraph 018 in relation to assessing harm to a heritage asset;

Paragraph 019 in relation to assessing harm to conservation areas;

Paragraph 020 in relation to the term 'public benefits'; and

Paragraph 039 in relation to the definition of 'non-designated heritage assets'.

In addition, I have had regard to the following guidance published by Historic England:

Historic Environment Good Practice Advice in Planning: 2 – Managing significance in decision-taking in the historic environment of July, 2015,

Historic Environment Good Practice Advice in Planning Note 3 (Second edition) – The setting of heritage assets of December, 2017, and

Historic England Advice Note 4 – Tall buildings of December, 2015.

For the above reasons, I urge Hounslow Council to refuse the current application for Outline Planning Permission for the proposed residential development of the existing Tesco Site.

Paul Velluet

2nd November, 2020.

B.A. Hons., B. Arch. Hons., M. Litt., R.I.B.A., I.H.B.C
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