

07 February 2017

Dear Mr Coomber,

RE. P/2017/0053 - Gillette South

OWGRA accepts that the site has to be developed as it has been vacant for many years, however it has very strong concerns regarding the current proposal and would like to submit its objections.

- **No site ownership is listed for this application**

First and foremost, information regarding the site ownership is not included in the application. This in itself should be sufficient to render the whole application null. We seek to find out what the position of the Council is regarding this point.

- **Community involvement**

According to a document made available on 30 January 2017 at a meeting organised by Cllr. Louki, the developers stated that their clients 'have organised three separate sessions with residents and local residents' group around the plans for this site'. To be specific two pre-application consultations in October 2015 and October 2016 are mentioned, as well as a post-submission presentation in Mid-January 2017.

The sessions held in October 2015 and October 2016 were badly advertised, hardly any households were notified in writing of such gatherings. The material brought forward to these meetings by the developers was inadequate, comments made by the public were rebutted rather than taken as feedback and no feedback forms were available to record comments. Many residents were surprised by the tone of the consultation and the way queries were answered. A key concern reported to OWGRA by residents throughout the past few months has been the lack of feedback opportunity and dialogue with developers.

The Mid-January exhibition, referred to by the developers as presentation, was nothing of the sort. Exhibition boards were present, but the development was not presented to the attendees nor extensive information was given. The display boards also portrayed inaccurate views of the area, omitting nearby building and watering down colours to minimise the impact of the development. Notwithstanding timely communication with the developers' agents and reassurances received that the leaflets would be dropped to all households within an agreed area, very few households were actually notified of a gathering taking place.

The reality is that what should have been a residents' consultation, with an opportunity for residents to be involved in a pre-application two-way exchange, did not materialise. OWGRA maintains that the developers' obligations to engage and consult have not been fulfilled.

- **Context and character**

At the 30 January 2017 residents' meeting, organised by Cllr. Louki, the developers presented a 'fait accompli' regarding potential policy objections. The message was that very senior LBH officers already supported the scheme as proposed (including the massing) and that the proposal was policy compliant given the site was allocated as mixed use. Very senior officer names were cited, which, given the status of the proposal, seems wholly inappropriate and contentious.

The height and extent of the proposed development are entirely out of keeping with the surrounding area which is predominantly low-rise residential. The density of the residential part of

the development is three times higher than the recommended maximum for the immediate area.

In stark terms the site is allocated on the local plan for mixed use but if this is relied on it contravenes the context and character studies for the area. The developers state that the only way the site could be compliant as a mixed use site was through a tall building. The reason given is that the site is next to a 'motorway' and the air quality is too poor to allow new homes at a lower level than proposed. While we are no experts in air quality, we cannot imagine that this is what was envisaged when the site was proposed for mixed use.

The proposed development contravenes policies CC1 and CC3 of the local plan. It is not sensitively located. It does not relate and respond to the character of the surrounding area. It is not of a scale that reflects relevance and hierarchical importance when located within a grouping cluster of high buildings. The Gillette Building is often seen as a deftly understated design amidst the elaborate and ornate nature of much else of the Great West Road. Part of this understatement derives in large measure from the layout of the area to the front of the factory. The importance of the Gillette Factory as a building by the famous architect Banister Fletcher is considerable, the current proposal will alter the setting in an unacceptable manner.

The size and position of the various elements of the development are overtly dominant in appearance and, cumulatively, they appear as visual clutter which detracts from the character and appearance of the street scene (these same reasons were given by LBH when enforcing building control measures on Shell Garage, Twickenham, ADV/2016/0074).

- **Golden Mile**

Play is also made of the fact that the development complies with the Golden Mile vision and masterplan. However, the Golden Mile document is wholly irrelevant since no local plan for the Golden Mile has yet been approved, let alone adopted, therefore this application could legally only be considered against the current local plan. Furthermore, we ought to point out that this site would not in any case be part of the Golden Mile since the Golden Mile is accepted to end on the East side of Syon Lane. As to the reference that the developers make to this development being the "gateway" to the Golden Mile, it is completely inaccurate for the reasons above and considering that the listed Gillette serves this purpose admirably and has done for many years.

- **Traffic**

Vehicular access to and from the site will simply add to the traffic volume already experienced. The A4/Syon Lane/Spur Road junction is one of the busiest and most dangerous junctions along the A4. The junction is already seriously polluted, especially during the peak hours. Traffic queues in every direction are the norm. Developers state that all existing standard requirements will be met, provided their projections are correct and everything else remains the same. Will the number of cars on Syon Lane and GWR remain the same (there are three major schools planned within the vicinity, the expansion of the SKY headquarters, the redevelopment of the Gillette building)? Will the number of flights remain the same?

- **Pollution**

The applicants have not conducted any on-site pollution measurements and have thus far relied on computer models. As far as noise and air pollution are concerned the applicants claim all existing standards will be met, but the contradiction is that the model of the residential development already admits that pollution levels are too high for the flats to be placed at lower levels and concedes that, even as planned, many bedroom windows will have to be sealed and corridors will not benefit from

direct sunlight.

The reality is that the number of residents is expected to be in the region of 200-300 and they will be living in a highly polluted area, with the outlook of having to live in a cocooned atmosphere.

We cannot as yet estimate what impact the commercial activities of the site will have on the surrounding area. Apart from the Access Company storage facility, there will be small-size commercial outlets with attendant vehicles and deliveries etc.

The conclusion is that the site is heavily polluted and therefore unsuitable for residential development.

- **Parking and PTAL**

The developers suggest that the site has very good public transport access, however this statement is contradicted by the reality of a PTAL 2 where the site is located. The area is badly served by public transport. At 42 spaces for 200-300 residents, the car parking provision is inadequate and whilst residents will not be able to apply for off-site parking permits, there can be no restriction on their possessing cars resulting in ad-hoc parking in the surrounding area where CPZs do not already exist (e.g. GWR and Syon Park Gardens). Car parking in the entire area is already at breaking point, with three new schools planned in the immediate vicinity, the expansion of the SKY headquarters and the redevelopment of the Gillette Building.

- **Impact on neighbouring properties**

The daylight sundial effect is not quantified by the developers, however many residents on Syon Lane, Great West Road and the Northumberland estate have consulted the tables in the daylight documents and are concerned about the effect the proposals will have on individual properties. All the application claims is that BRE standards are met.

- **Loss of view of the landmark Gillette Building**

Vistas from far around are important with the Gillette Tower as the predominant landmark. These views will be adversely affected by the proposed scheme. The Gillette Building is a listed building and many properties enjoy views of it, and they will be deprived of this visual amenity should the development be allowed to go ahead.

Below are the roads that will be impacted by the development and will lose sight of the Gillette Tower. We also attach some images sent in by residents from nearby roads, showing the view from properties in the streets that will be affected.

Streets affected:

Northumberland Avenue, Redesdale Gardens, Hexham Gardens, Otterburn Gardens, Rothbury Gardens, Parkwood Road, London Road, Hartham Road, Finney Lane, Jodrell Close, Downs View, Blenheim Way, Deepwell Close.

- **Interference with satellite signal**

The location, mass and density of this development would interfere with the satellite signal coming from Crystal Palace, as the new building is directly placed on the trajectory between Crystal Palace and the Wyke Estate and parts of Jersey Road. Households within the Wyke Estate will be severely affected by this development.

- **Other considerations**

- None of the flats will be for sale, only for rent, plus with predominantly one-bedroom offering, they are not aimed at families. As such, this residential development is not looking to resolve the presumed long-term shortage of family housing in the area. Precluding the opportunity of purchasing the flats, also means that residents will look to stay on a temporary basis, thus contributing to create a volatile residential occupation, not conducive to good community liaisons and lending itself to heavy use by housing associations.
- The developers stated previous to the application being submitted, that the scheme was already supported by the GLA and CABE. This may be the case, but given that no design details were available, we are quite surprised that CABE had reached a definitive view.
- The applicants suggested that the small employment units would serve SME manufacturing firms, but we find it hard to see how this type of occupier would benefit from this use, given the lack of loading, parking and suitable access proposed (there is none!).
- There is one classic error in the application - which is serious because it highlights a lack of facilities. The application shows the distance to nearby doctors' surgeries as being 1.7km to Thornbury Rd Centre for Health and 1.4 km to Spring Grove Medical Practice. Since these surgeries are co-located in the same building, the information is misleading. Furthermore, neither facility is very accessible if you are not well.



Yours sincerely,

Brij Rathor

Chairman, OWGRA