

Comments on the *The Try Homes Application to Develop the Champion House site: Planning Statement in Support of a Planning Application in respect of Champion House Osterley*

Prepared for **Campion Concerns** by David Pavett, 5th July 2006.

Main points

- **This Planning Statement has not been drawn up to an adequate standard** for such an important development. It is full of mistakes, omissions and misleading statements. (We have found this to characterise the main supporting statements for this application.) It therefore does not achieve its purpose of justifying the application.
- **It is claimed that the local community was consulted** (last November/December). That 'consultation' was a farce in which the developer sought only to massage opinion to fit their general plan. Furthermore the current proposals are substantially different from those presented last year.
- **The document seeks to denigrate the Spring Grove Conservation Area** by repeated references to the erosion of its historical character and negative comments about 20th century developments. At no point is there an effort to evaluate (1) what remains of the 19th century plan for the area or (2) the nature of the existing housing adjacent to the site (especially the housing along Thornbury Road facing the site).
- **It is claimed repeatedly that the site is transitional between urban and suburban.** The reason for this is clear: the developer wants to claim that the Planning Department has situated the site in the wrong part of the density matrix. The claim of a "transitional" status has no basis either in planning documents or in the reality of the site which quite clearly meets the London Plan definition of suburban.
- **It is constantly suggested that the site is within "easy walking distance" from the town centre.** It is even hinted that it is just beyond the 10 minutes walk requirement. In fact it takes 20 minutes to walk to the town centre from the site.
- **The Transport for London's PTAL rating of 2 ("poor") for the site is constantly questioned.** This rating has been confirmed by TfL since Try Homes began to question it.
- **It is hinted that the site is only "just" in an area of public open space deficiency** and then only because of restrictive conditions about crossing the A4. In fact Osterley Park is more than 400m from the proposed main entrance to the development and the main park is only reached after walking along a very long driveway.
- **The developer claims that there is no area on the site which should be treated as a sports field.** In fact the sports pitch meets the requirements of the definition of sports fields given in the Town and Contry Planning (Playing Fields) (England) Direction 1998.
- **It is not acceptable that some of the homes are not constructed to lifetime standards.** The document says that a "majority" of the homes will be built to these standards.
- **It is completely out of character with the area to propose a development for predominantly non-family homes.**
- **The density calculations in the document are incorrect.** Even if we assumed that the whole site area should be used the density is beyond the recommended range in the London Plan density matrix (Table 4B.1). Even on the most generous assumptions (to the developer) the density proposed is twice that of the surrounding housing. The developer tries to use two incompatible definitions of density at the same time.
- **The proposed main building frontage is completely out of character with the area and would dominate it to its detriment.** The main building, unlike anything else in the area, is too high, too long, and too massive.
- **The proposed loss of designated open space is unacceptable.** We now understand, more than ever before, the importance of maintaining open space with natural growth and with natural soakaway. Developments over the years have systematically reduced the Conservation Area's green space (including recent developments). That process must now come to a halt.
- **The guidelines referred to constantly remind the reader of the importance of local context.** This point is repeatedly ignored in the Planning Statement.

In the remaining sections of our comments we make a detailed examination of points arising from the document under consideration. **We conclude that it is of such poor quality that it suggests a lack of research. There appears to have been little concern for accuracy. This, along with similar problems with the other main supporting papers results in an application which is not acceptable on many different counts.**

1. The **Introduction** claims that the document will “fully assess the planning merits of the proposed development” and that it will show how the development would be completed “whilst also retaining and enhancing the character of the site and the surrounding area”. In the event the document fails to do either of these things (see below).

2. The **Site Location and Description** shows what is meant by “retaining and enhancing”. The surrounding area is described in terms which are sufficiently loose to avoid the negative comparison with the proposal that a more detailed description would yield. Further, the Conservation Area is described in negative terms to minimise the responsibility to respect its character. Where there is not misrepresentation by omission and by incorrect statements there is spin i.e. statements are made which, while not false as such, could not but fail to give a false impression to someone without a detailed knowledge of the area.

Examples of spin.

<i>The document</i>	<i>The reality</i>
Facing properties to the North of Church Road are said to be “effectively greater in height than two stories”	They are on raised ground making the height equivalent to two and a half stories .
To the South of Church Road all we are told about the facing properties is “Full three storey flats are found ...”	The flats in question (Fairacre) belong to a small block (6 flats) on the corner of Church Road. The height of the flats is the same as that of the neighbouring two storey Edwardian houses which are not mentioned.

This spin is immediately followed, in para 2.4, by a denigrating account of the Conservation Area: “The Spring Grove Estate has been comprehensively redeveloped over the years and its original Victorian character and appearance has been eroded by widespread demolition of the original Estate houses and the erection of numerous 20th century housing developments of unremarkable quality”. Not much worth “retaining and enhancing” to be had there, it would appear.

This point is key to the whole application. All we ever hear about the Conservation Area is that its 19th century substance has been “eroded”. This is clearly true, and is no doubt true of any similar conservation area. The question is, of course, how much erosion has there been and what of substance is left. On the latter points the document is silent. Someone without detailed knowledge of the area would be likely to conclude that any remaining 19th century heritage is of little value.

It should be noted that the Conservation Area Assessment Statement in the application takes this process further. It also makes the point that in an appeal over the application on grounds of failing to preserve and enhance the conservation area the applicant would be entitled to challenge the grounds for the original designation of the area for conservation purposes. *It seems reasonable to conclude that Try Homes, in order to pursue its application, has the Spring Grove Conservation Area in its sights.*

It is striking that a company specialising in conservation area assessments (CgMs Consulting) should sweep aside the developments of the last century as “numerous 20th century housing developments of unremarkable quality. Without going further into the conservation area there are a series of properties facing the Champion site which are of real interest. To the north there is a series of Arts and Crafts houses from the 1920s and to the south there is a series of 6 Edwardian houses already noted in the original conservation designation as being of special historical interest. Not for Try Homes and CgMs Consulting it would seem.

In Para 2.8 spin turns to falsehood.

<i>The document (2.8)</i>	<i>The reality</i>
The buildings opposite the site are described as “effectively 3 stories in height or more ...”	The buildings opposite are mostly 2 storey (some of them on raised ground) with a small 3 storey block of flats no higher than adjacent two storey houses.
The site is said to be in an area which is “transitional in form between the suburban and urban settings defined in paragraph 4.47 of the London Plan ...”.	Paragraph 4.47 of the London Plan defines suburban as follows “ Suburban: <i>lower density development, predominantly residential, of two to three storeys, as in some parts of inner London and much of outer London.</i> ”

The definition of suburban given above (4.47) seems to define the catchment area for the development very well. **The only thing that might call it into question would be a development along the lines proposed by Try Homes!**

The remaining notes are intended to bring out some of the most striking examples of spin and departure from reality found in this main submission statement. We end with a few conclusions.

<i>The document</i>	<i>The reality</i>
2.9	
“The location provides a good level of public transport accessibility as several bus routes pass along these roads”	The area has a transport rating (PTAL) of 2 which is “poor”. Since Try Homes began to question the transport assessment this rating has been confirmed by Transport for London.
2.10	
“There is an existing cycle route along the northern section of Thornbury Road ...”	Part of Thornbury Road is designated as a cycle route but it is in practice very unfriendly to cyclists with parking on both sides.
2.11	
“There are schools within reasonable walking distance ...”	There is no indication of the capacity of local primary schools and the likely impact of the Brunel and Campion developments. Neither are we told what is meant by a “reasonable walking distance” which makes it difficult to challenge the assertion. This is presumably intentional.
2.12	
“Although it falls outside of the 10 minute easy walking distance from the town centre it falls well within the 2km distance defined in PPG13 where walking is the most important, Travel Mode”.	It takes about 20 minutes walking briskly to reach the town centre. PPG13 does not define walking as the most important travel mode under 2km. It says that it “offers the greatest potential to replace short car trips, particularly under 2 kilometres” which is not quite the same thing. Para 6.12 of the Supplementary Guidance (Housing) to the London Plan says “10 minutes walking distance is assessed as 800 metres”. RAC software indicates that the distance is more than 2km. In any event, we know that it is a 20 minute walk. Mr Nicholson of Try Homes declined to do this walk with us.
2.13	
“There is a substantial area of public open space in close proximity (350) to the site at Osterley Park...”	Osterley park is over 400 metres away from the proposed main entrance to the development. It should be added that the main park is a further 200m from the main entrance! It is clearly more hazardous for children if they have to cross a major highway to reach the open space.

<i>The document</i>	<i>The reality</i>
2.14	
“Previously developed land is defined with Annex C of PPG3 as that which is or was occupied by a permanent structure, and includes all of the land within the curtilage of the development, i.e. The area of the land attached to the building”.	The document claims that the application of the principles and definitions of Annex C to PPG3 “is discussed later in this report”. In fact the later discussion is about density and not about previously developed land. See comments on paragraph 6.10 below.
2.15	
“... none of the open land complies with the statutory definition of a playing field for the purposes of the Planning Acts as set out in the 'Town and Country Planning Act (Playing Fields) (England) Direction 1998”.	In fact we have evidence from local schools for the use of the playing field within the last four years which brings the field into the definition of the Town and Country Planning Act which says <i>"playing field" means the whole of a site which encompasses at least one playing pitch". Land owned by a local authority which falls within this definition includes, for example, parkland, open space used for informal recreation, or land leased to sports clubs, as well as playing fields used by schools, colleges and other educational institutions.</i> In correspondance Try Homes has recognised that the sports field has been used in the recent past but have sought to dismiss that use as mere “kickabout”.
4.3	
There is discussion of protecting and enhancing “the quality, character and amenity value of urban areas as a whole....”	The site is in a suburban area as is explained in the original Draft Planning Position Statement for the development.
4.4	
“Paragraph 38 indicates that design policies should concentrate on guiding the overall density, massing, height, landscape and access of new development”.	The writers of the document didn't notice the following passage which adds “It is, however, proper to seek to promote or reinforce local distinctiveness.” That is something the proposals fail to do.
4.5	
“Paragraph 9.11 encourages the provision of more dwellings for smaller households, and note that the Government does not accept that different types of housing and tenures makes bad neighbours. Rather it seeks to encourage mixed and inclusive communities. These principles are also reflected in the application scheme.	Somehow the writers of the document failed to notice the phrase which immediately follows according to which developers should “help to secure a better social mix <i>by avoiding the creation of large areas of housing of similar characteristics</i> ”. This is, of course, exactly what the developer has done.
4.7	
PPS3 is referred to as requiring of developers a better balance between supply and demand for different types of housing.	The developer has notably failed to match supply and demand by the proposed imbalance between 1/2 bed flats and 3/4/5 bed accommodation. The authors of the document also failed to notice that PPS3 brings the density range for a site like Campion from 30-80 to 35-55!

<i>The document</i>	<i>The reality</i>
4.8	
More discussion of housing in <i>urban</i> areas.	The site is <i>suburban</i> .
4.10	
PPG17, paragraph 16, is quoted to the effect that loss of open space can be weighed against benefits provided.	What para 16 actually says is “Planning authorities may wish to allow small-scale structures where these would support the existing recreational uses (for example, interpretation centres, toilets, and refreshment facilities), or would provide facilities for new recreational uses.” In other words it is suggested that some building might be possible if it facilitates recreational use. That is not the sort of loss proposed by Try Homes. In addition it should be noted that the London Plan (2004) is later than PPG17 (2002). The London Plan insists on the importance of preserving London's open space. Since 2004 the importance of this has been further heightened by various reports.
4.15	
London Plan 4B.3 is discussed in a way which tries to undermine the classifications used to position the site within the 4B.1 matrix.	It is said that the matrix uses only “broadbrush criteria” and that each variable is defined by “only 3 categories”. This is just negative waffle. Three variables with 3 categories gives a theoretical possibility of 27 values. In practice this amounts to 10 possibilities in the 4B.1. How many does Try Homes want? This paragraph contains more discussion of sites within an urban setting and within 10 minutes of a town centre as if this had some relevance to the Campion site. It doesn't.
4.18	
High density developments are possible “subject to ensuring high levels of public transport accessibility,”	Not relevant to the Campion development.
4.20	
“Policy ENV-B.1.1 seeks to ensure development is compatible with the character of the area and enhances it in terms of size, scale, materials and design.”	This development transparently fails to meet this requirement.
4.21	
“Policy ENV-B.2.2 states that the Council will preserve and enhance the character or appearance of existing conservation areas by ensuring development respects the character of the existing architecture”.	Again, the failure of the proposals to meet this condition is striking. The contrast between proposed building and the housing opposite (including the spacing between them) is stark and none too pleasant.
4.24	
<i>Policy H.4.2. Relates to residential density and indicates that it is of secondary importance.</i>	Secondary ≠ negligible. Try Homes shows no awareness of the housing density of the surrounding area.
4.29	
More talk of “urban land”.	The site is suburban.

Following the above background, **Section 5** presents the development proposals. After some initial waffle we come to the details.

<i>The document</i>	<i>Our comment</i>
5.4	
This scheme is divided into 62 1-bedroom, 170 two-bed, 20 three bed flats, and 21 4-bed houses.	The ratio of flats to houses is contrary to the character of the area. The ratio is also contrary to established needs.
5.6	
“The proposed buildings would be a set in a number of interlinked landscaped open spaces of different character.”	The main building presents a massive block which would dominate the visual aspect of the whole area. Not much there in the way of “interlinked open spaces”. The exact nature of the “interlinking” is not clear but it would appear that it will be necessary to pass between one and perhaps two gates to reach the open space at the rear. Given the small size of the area this will be a significant disincentive to using it.
6.2	
“It is considered that a residential scheme incorporating a mix of dwelling sizes is most appropriate for this site given its previously developed nature, the character of the area and the proximity to public transport links and Hounslow town centre. Furthermore, it would accord with its conservation area status and historic interest, whilst also offering the potential to provide areas of enhanced publicly accessible open space.	Paragraph is nearly a masterpiece of obfuscation. 1. Mixing dwelling sizes is not enough for a development on this scale. There is a need for different types of dwellings that would be acceptable to the different types of potential occupants. 2. Again, we find “proximity to public transport links”. Doesn't sound like a PTAL of 2. 3. Again, we find “proximity to Hounslow town centre”. The town centre is 20 minutes brisk walk (over 1600m). 4. The residential scheme does not accord with the area's conservation status (on grounds given elsewhere in these comments) and merely repeating that it does will not make it so. 5. The scheme has nothing whatsoever to do with the historic interest of the area. The assertion that it has is just that, an assertion. No reasons are given.
6.4	
“The site is a previously developed site within the urban area”	The technique of constantly repeating “urban” will not change the suburban status of the site although it is clear that the developer thinks that it will.
6.6	
“PPG3 seeks densities of between 30-50 dph, although this can be increased in sustainable locations. This approach is taken further in Policy 4B.3 of the London Plan which seeks to maximise the potential of sites”.	Why the vague reference to 4B.3? What 4B.3 actually says is “highest possible intensity of use <u>compatible with local context</u> , the design principles in Policy 4B.1” (Our emphasis.) It is not clear to us that the terms “sustainable location” makes any sense. The question is whether a given design will result in sustainable housing in a given location or not.

<i>The document</i>	<i>Our Comment</i>
6.7	
<p>“The site area for the purpose of the density assessment has been taken to include the whole area within the planning application site boundary because Annex C of PPG3 advises that it should include access roads within the site, ... Open space is only excluded where it serves a wider area”. (Our emphasis.)</p> <p>“An additional area equating to a 6m width of the Thornbury Road frontage has been added ...”.</p>	<p>What is the word “because” doing in this sentence? Annex C says nothing about including the whole site area. In fact, as the end of the sentence indicates, it details areas which should be excluded from that area!</p> <p>It is suggested that the site area should include the width of half of the external road in accordance with Hounslow UDP para 8.31. This possibility is specifically excluded by Annex C to PPG3 which supersedes the UDP on this point. It is therefore being proposed that the application should use two incompatible definitions of density at the same time.</p> <p>This section also invents a new category of “dual use” of open space which has no status within planning. Indeed it is nonsense since open space for wider use is, by definition, accessible to everyone including the residents of the development.</p>
6.8	
<p>“Thus the assessed density of the proposed scheme based on 839 habitable rooms (273 dwellings) and a site area of 3.38 hectares is 248 hrh or 80 dph.”</p>	<p>The total site area is 3.26 hectares. The net site area is the total area minus buffer strips and land for wider use etc. Even if we were to accept, which we do not, that no buffer strips are required and that there is no land for wider use this would still not produce the figures given in the document. $839/3.26 = 257$ hrh, $273/3.26 = 84$ dph. See Appendix A on Density.</p>
6.9	
<p>“...the Campion House site does not fit neatly into any of the cells in the density matrix in table 4B.1 of the London Plan ... its setting is transitional between the suburban and urban categories ... it is within reasonable walking distance of the town centre ... better related to public transport facilities than many sites with a formal PTAL calculation of ...”</p>	<p>See previous comments. Further comment would be superfluous except to say that this is more of the drip-drip of repeating the same assertions without making a case.</p> <p>It is clear that the site is suburban and has a PTAL of 2. Its position on the matrix is clear. The only thing which is not clearly agreed is the net site area.</p>
6.10	
<p>“The assessed density complies with the upper range indicated as the potential for sites in a suburban setting with a PTAL of 2-3. Having regard to the above analysis, we consider that a higher density could be justified...”</p>	<p>The density is beyond the indicative range for such sites. If buffer strips and land for wider use were discounted, as required by Annex 3 to PPG3 then the density figures would be far higher. The grounds for asserting that higher density could be justified are entirely spurious (see earlier comments). At no point has the developer considered the density of the surrounding built environment.</p>
6.11	
<p>“Indeed if contrary to our assessment it were considered that some of the open space area should be excluded from the site area for density-calculation purposes as serving a wider area, the assessed density figure would be far higher...”</p>	<p>Indeed it would! The authors of the document have wandered off into musings which form no part of their case.</p> <p>It is clear in PPG3 Annex C that areas for wider use and buffer strips should be discounted.</p>

<i>The document</i>	<i>Our Comment</i>
6.12	
“We conclude that the density of the proposed scheme accords with the aims of PPS1 and PPG3 In any event these policies do not preclude densities higher than the levels indicated in the table [4B.1] where compatible with local character ...”	This conclusion is based on assertion and not on a reasoned case. The proposals are NOT compatible with local character and at no point does this document attempt to show that it is. If PPS3 supercedes the London Plan w.r.t density calculations then the indicative range is 35-55 dph which means that the proposals are even further beyond the matrix range.
6.13	
The development is described as one for “predominantly non-family accommodation”	A predominantly non-family development would be appropriate in a town centre. It is not appropriate in a residential area. It is certainly out of character with the surrounding built environment.
6.16	
“The scheme complies with national policies to encourage more dwellings to meet the needs of smaller households, whilst also providing a proportion of family accommodation.”	National policies do not provide local criteria. The increase in provision for smaller households is already being provided in town centres. In fact there is a relative oversupply of 1/2 units according to recent reports. The Campion site is not an appropriate location to provide mainly non-family accommodation.
6.21	
“... the majority [of units] will be built to Lifetime Homes standards ...”	What is this “majority”? This statement would allow for 49% of the proposed homes not to be built to Lifetime Home standards! The London Plan says that local policies should ensure that “ all new housing is “built to ‘Lifetime Homes’ standards”. (Our emphasis.)
6.24	
“The scheme has been designed ... having regard to the context of the area, the height, scale and design of surrounding buildings ...”	This is exactly what the design flamboyantly fails to do. No case has been made. There is no consideration of what the height, scale and design of the surrounding buildings is. This is more mere assertion.
6.25	
“The public consultation exercise highlighted that local residents expressed a wish to see a 'Classical design ...”.	This is a bit like saying that those who bought the first Model T Ford 'expressed a wish' to have black cars and that this was demonstrated by their choice of black cars.
6.26	
“The current arrangement of buildings does not allow for views through the site and to the open space at the rear. The proposal aims to break down this frontage, by creating substantial gaps both sides of Campion House”.	The main block would be longer and higher than the present main block. This would become by far the visually most dominant aspect of the development. The gap at the end of the block would be relatively insignificant in contrast to this heavily dominant form. The present buildings also have visual gaps at least one of which would be made smaller.

<i>The document</i>	<i>Our comments</i>
6.30	
“Houses are the dominant physical form of the new buildings overlooking the northern garden, as well as occupying the longest sides of the quadrangle.”	This slippery sentence tries to make the most of the 21 houses as against the 252 flats! It is open to question whether the houses would be the dominant physical form from the angle of the northern open space. There is no question that from Thornbury Road the houses would not even be visible, let alone be considered as the dominant physical form!
6.32	
“The proposed new elements of the scheme will not be taller than Campion House.” The main block “would be approximately 1m higher at ridge-level than the existing dormitory block ...”	Residents clearly expressed a desire for the buildings to be no higher than the ones they replace. This hides the fact that block C rises even higher than this and is even marginally higher than Campion House.
6.35	
“... the whole site is defined in Government planning guidance as 'previously developed land' ”.	PPG17: 14. “Parks, recreation grounds, playing fields and allotments must not be regarded as 'previously-developed land', as defined in annex C of PPG3. Even where land does fall within the definition of 'previously-developed', its existing and potential value for recreation and other purposes should be properly assessed before development is considered.”
6.40	
“Public access will also be provided to the proposed quadrangle ... reducing the net incursion by some 8%”.	This is unrealistic. The space is not suitable for public access and the people living in the block would not welcome it.
6.40	
“This area [the quadrangle] has the advantage of being clearly visible from Thornbury Road...”. “Public access will also be possible to the landscaped Thornbury Road frontage ...”	It is clear from the drawings that this would not be the case. A small part of the quadrangle only would be visible for a relatively small viewing angle. The view would also not be open since the main entrance has flats built over it. This is would be very unlikely to be acceptable to residents living in such a development.
6.42	
“The open space boundary line shown on the UDP Proposals Map has been drawn tightly round the backs of the existing buildings”.	It has not. The boundary allows for significant incidental space – even including a pond and the area round it.
6.50	
“... the aims and objectives of the strategy [!] are to ... maintain the existing landscape character of the Thornbury Road frontage by the retention of existing trees”. The developer will “replace any trees that need removing with new planting...”	It is clear from other support papers that it is only intended to retain some of the existing trees at the front. If a semi-basement car park is built then the top soil would not be deep enough for substantial trees. Indeed the landscape document indicates that what they have in mind is potted trees!

<i>The document</i>	<i>Our comments</i>
6.55	
The landscaping “will result in a net gain in vegetation cover on the site and enhance the nature conservation and biodiversity on the site, resulting in the creation of new habitats, providing the areas with different characters and encouraging more species into the site.	Where is the evidence for any of this? Trees are being removed and open space is being diminished. It is difficult to see how this would result in an increase in biodiversity. The pond is being removed and not replaced!
6.57	
“The terraced, 4 bedroom dwellings provide approximately 55 m ² . Whilst this falls below the SPG guideline [75 m ²]”	Aren't these homes pokey enough already without adding insult to injury?
6.58	
	I can make little sense out of the figures in this paragraph. I hope the planners can decipher it.
6.65	
“Trip generation estimates for the proposed development suggest no improvement to pedestrian, cycle of public transport facilities is required to meet demand generated by the development”.	See our response to the Transport document which we believe to be sufficiently flawed that it requires re-writing.
6.77	
“Where exceptionally the 21m guideline is breached, for example across the proposed sections of courtyards perpendicular to one another, this angle is oblique and is not considered to result in overlooking issues.”	The building is also too close to 104 Thornbury Road. Some of the distances are as small as 15m and the angle would allow for significant nuisance viewing.
6.79	
“In relation to daylight, there is only one window to one property to the north of the site, 141 Thornbury Avenue”	Where is 141 Thornbury Avenue?
6.82	
“In relation to sunlight, there are three windows that would be affected. Two of these would see only a marginal change, 99 and 101 Thornbury Road, whilst sunlight to the third window at 141 Thornbury Road will remain well above minimum BRE standards.	141 Thornbury Road is on the other side of the A4! The building is too high. A lower building would not impact on 99 and 101.
6.83 – 6.88	
	The consultation organised by Green Issues was a farce as Campion Concerns has shown in detail.
7.1	
“We conclude that the proposal: ... is at an appropriate density which respects the site and the surroundings would contribute to the Borough's housing needs has been well designed will enhance the local ecology... ... has taken into consideration the opinions of local residents...”	No case has been made for this and it is not true. The mix is wrong and therefore does not meet needs effectively. It is not sensitive to the surroundings and is poorly designed on many other grounds. No case has been made for this. Absolutely not! The consultation was a farce.

Some Conclusions

For a main supporting statement for a major development this Planning Statement is a strikingly shoddy document. When it comes to implementing a broad design most of the effort has to go into concern for detail. No such concern is evident in the document. As we have shown above it is shot through with invalid references, incorrect details, misleading statements and repetition of assertions which are not backed up by argument and data.

In the time available it has not been possible to chase every detail in the document but we hope that sufficient of its weak points have been highlighted for it to be evident that as a main supporting statement for a major development this supporting document is a travesty of what is required.

Campion Concerns is analysing all the supporting documents and will be producing written comments on all of them. We have already noted a similar lack of concern to make a reasonable case in many of these documents. Above all, we have found that the document on the Conservation Area makes no attempt at an objective evaluation.

The documents as a whole would appear to be driven to such a high extent by the conclusions required by the developer that their value as a reasoned case, which weighs the various factors and then reaches a balanced conclusion, is negligible.

4th July 2006

Appendix A – Density Calculations

It has been clearly established that the Campion site is suburban and has a PTAL rating of 2.

The current approach to density calculations is that of Annex 3 to PPG3. These recommendations (which are essentially about the definition of net site area) should be used in conjunction with the density matrix of table 4B.1 of the London Plan. The Draft replacement for PPG3 is PPS3, which unlike PPG3 contains an indicative density range. If PPS3 is adopted then these ranges would replace those of the London Plan.

The total area of the site is 3.26 ha. 2.09 ha of this is open space which should not be encroached upon. That leaves 1.17 ha for building and, arguably, for their incidental open space.

The main unresolved point with respect to the Campion site is what area should be used for density calculations. The Planning Statement suggests using mixture of the Hounslow UDP and PPG3 with respect to the area to be used in density calculations. **This is untenable** since the two definitions are in conflict. In such circumstances it is the higher level (i.e. PPG3) document that takes precedence. In the calculations below we have calculated the density for this development using a series of different areas.

Area 1 = total site area of 3.26 ha

Area 2 = total site area minus 0.9 ha (see para 6.11) = 2.36 ha

Area 3 = total site area minus 1.5 ha (we consider 0.9 ha to be unviable) = 1.76 ha

Area 4 = total site area minus locally designated open space = 1.17 ha

In each case we have calculated the resulting top end of the indicative range from (1) the London Plan table 4B.1 i.e. using 80 dph and (2) from PPS3 i.e. Using 55 dph.

Before presenting these calculations we would like to emphasise that these are indicative ranges only and that before deciding on the application members should take into consideration the type, style and density of the adjacent built environment.

We strongly suggest that in order to respect the character of the area the density should be around 40 dph (which allows for a significant increase above that of the housing facing the site).

	<i>Density=80 dph (Top of London Plan range) No. of Units</i>	<i>Density=55 dph (Top of PPS3 range) No. of Units</i>	<i>Calculated density (273/Area) dph</i>
Area 1	261	179	84
Area 2	189	130	116
Area 3	143	97	155
Area 4	94	64	233

Note that by whatever calculation the density on the Campion site is found, it is greater than the top of the indicative range of the London Plan. It is even more in excess of the recommendations of PPS3.

We understand that it is not *density as such* that can form the grounds for objecting to a development, but rather *the effects of density* (i.e. the harm, if any, which may result from it). However, the indicative ranges are there for a purpose. That purpose is to indicate a typical range. If a development proposal results in a density which is outside the range then that is a *prima facie* reason for looking into the matter to see if there are any problems. Our point is that there *are* such problems. The style, height, length, and mass of the main building, resulting from the high density of units proposed, is such that it is out of character with the area. It would in effect destroy the extremely pleasant aspect created along Thornbury Road by the Edwardian and Arts and Crafts houses facing the development (and even including the flats built sympathetically and to the same skyline as the adjacent housing).

It is hardly surprising that there is a visual conflict between existing housing and what is proposed when one notes that there are 27 homes along the opposite side of Thronbury Road (facing the development) as against the proposals 273 homes.