

Comments on the Try Homes response to London Borough of Hounslow Sustainability Checklist

Campion Concerns 20th July 2006. (Comment on 7.a/b modified 15th November 2006.)

The numbers refer to those of the Checklist.

1.a. The word “could” gives no effective information. (I “could” be a really good musician if I practiced hard enough. The thing is that I don't.) Does Try Homes have a specific plan to recruit local labour? If so then what are those plans. If not then say so.

4.a. This is incorrect. PPG3 Annex 3 says

“The definition excludes land and buildings that are currently in use for agricultural or forestry purposes, and land in built-up areas which has not been developed previously (e.g. parks, recreation grounds, and allotments - even though these areas may contain certain urban features such as paths, pavilions and other buildings). Also excluded is land that was previously developed but where the remains of any structure or activity have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings), and where there is a clear reason that could outweigh the re-use of the site - such as its contribution to nature conservation - or it has subsequently been put to an amenity use and cannot be regarded as requiring redevelopment.”

The area on which the flats are to be placed includes an area which the developer agrees was used for recreational purposes (the developer refers to children using the area for a “kick-about” which is a form of recreation).

4.c. The claim made by the developer is misleading and given their experience in dealing with issues like this it is hard to believe that this is not deliberate. It is claimed that there would be no net loss of any “Green Belt, Metropolitan Open Land or Public Open Space”. Of course no such loss would occur since none of the land on the site comes under any of these headings. 2.1 hectares of the site is designated as **local open space**. The developer is proposing to encroach on this open space. Even developer's application papers claim that this encroachment will be 'only' 15%. This encroachment is described as “limited”. Of course it is, anything less than 100% would be limited. It remains that any encroachment is unacceptable given the importance of open space and the losses already incurred in the conservation area. Furthermore we suspect that that a detailed investigation would show that the encroachment is actually even more than 15%.

4.d. The quality of the open space retained is not the same as that being lost. It is, moreover, plainly ridiculous too claim that the courtyard spaces constitute “publicly accessible” space. No member of the public would feel free to treat them as such and it is certain that this would not be acceptable to the residents living round the courtyards. When asked about this at the 10th July exhibition Mr Tilley of Try Homes said “They would have bought their homes knowing the conditions” which he presumably felt answered the point. It clearly did not and the idea that the courtyard areas are publicly accessible open space is a bad joke.

The quality of the space will be diminished since if the courtyards are considered as (non publicly accessible) open space then it is clear that green open space with trees is being replaced by non-green surfaces and potted plants – not a net gain for biodiversity.

The comment about parking is strange since there is no reason why ground level parking should be at the front of the development!

5.a. The overall quality and size of the 2.1 ha of open space would be reduced. There would be a loss of vegetation and the long-established pond would be removed. The tree survey should have been carried out using current BSI standards and should have been done by someone with knowledge of the area's

connection with Joseph Banks and Kew Gardens. More than 50 trees would be removed in a conservation area. This is described by the developer as “a small number of lower quality trees”. Some of those designated for removal are mature trees and cannot be replaced due to the proposed semi-basement car park which would not allow sufficient soil depth above for the deep roots required. This is why the trees proposed for the courtyards are actually potted plants.

- 5.b. This point consists of a series of claims. Where are the specifics which would be necessary for measurement of outcome against objectives? The tree survey is not of sufficient clarity to allow for proper protection of the trees by retaining the maximum number and making sure that those removed have a replacement which is at least as good. As already stated we believe that the proposed conditions of the site (e.g. the semi-basement car park) will not allow for equivalent replacements.
- 5.c. Where is the answer to this point? Can the silence be a mere oversight?
- 6.a. What about the 176k+ additional annual car trips? The exhaust fumes from increased traffic queues adjacent to the site, from the access road to the car park and from the car park itself, would certainly all impact on air quality.
- 7.a. The Energy Report was not supplied until October. It has all the signs of a poorly considered afterthought.
- 7.b. See comment on 7.a.
- 7.c. This cannot be true. Most of the bathrooms/shower rooms have no natural ventilation and would therefore require artificial ventilation. Presumably the semi-basement car park would also require artificial ventilation to prevent the build up of fumes.
- 8.a. Where are the details on this very important matter? It is proposed to “limit the surface run off from the development”? This is more slippery language to make positive sounding statements that actually mean nothing. What is the “limit” referred to?
- 8.b. Why would only “part” of the surface water drain to soakaways. What is it proposed to do with the rest? Pump it into the main sewer? That is contrary to SUDS. (Incidentally is it not time to question the “conventional channelling to storm-water sewers” that is mentioned in the checklist?)
- 8.c. What about other surfaces than the on-site roads?
- 9.a. “Part of the development”! How much? Will the wood be from a sustainable source and will this be certificated?
- 9.c. This comment is so uninformative that it is worthless. Is that all the developer intends to say?
- 9.d. “A proportion”! How many? Why not all as recommended in the London Plan?
- 10.a. Is using an unspecified amount of MDF supposed to be an answer to this question? What about other materials. What, incidentally is the MDF going to be used for? What about the toxic properties of the glues used for MDF?
- 10.c. More assertions with no details. At the 10th July exhibition the developer/architect could not show us the area(s) to be used for bin stores. Later we found them for ourselves. The bin areas are in the semi-basement parking area. They are at the bottom of the stairwell and behind the semi-basement flats. What arrangements are their for control the potential health hazards this could give rise to? How will the areas round the bins be ventilated?
- 10.d. What are the skips referred to? Will they be permanent? Where will they be placed? How will they be housed?
- 12.a. But where do these buses go? That needs a little comment surely.
- 14.b. Pedestrians entering the south end of the site to local open space do not have a continuous pavement and must cross the entrance to the underground car park.
- 15.a. Secure By Design will be “taken into account”. What does that tell us? Will the guidance of Secure by Design be followed and will Secure by Design certification be sought? Where is the mention of local consultation over crime prevention?
- 16.a. The townscape would be harmed by the replacement of two large uninteresting blocks by one large and even more out of character block that dominates and detracts from the pleasant suburban aspect

of the street and its period housing directly opposite the site. The loss of trees would also be detrimental.

- 18.a. The sports pitch would be lost. The replacement sports area is not equivalent and would only be appropriate for tennis/basket ball and not for football. Residents have not been consulted on this as required by PPG17.
- 19.a. The 'consultation was a sham. The requirements of PPG17 were not met.
- 20.b. Another claim with no evidence. We believe that current statistics indicate that there is an overbuild of 1/2 bed homes and an underbuild of 3/4 bed homes. In addition, to be in keeping with the area there would need to be far fewer units overall and a much greater ratio of houses to flats.
- 20.d. The existing gardens have not been retained as stated. Part of the formal gardens would be lost. In addition the garden area around the pond would be lost.