

4th February 2007

Campion House site: response to the 2nd Try Homes application

Summary

We believe that the Try Homes application should be refused on many different grounds. Foremost among these are issues connected with (1) design and (2) sustainability. We believe that there are clear grounds for saying that the proposed design is out of character with the area and, in addition suffers from intrinsic problems. Most of these problems result from attempting to build on an inappropriate scale and cannot be resolved without reducing that scale. Bad design, as PPS1 reminds us, should be refused by planning authorities. The proposed development is also unsustainable because it proposes (i) an irreversible reduction in open space, (ii) it fails to give adequate consideration to problems of biodiversity, (iii) surface water run off resulting from the construction of a semi-basement garage would lead to a large discharge into the main sewers, (iv) inadequate or no consideration has been given to handling foul water and grey water, renewable energy, (v) the impact on the local infrastructure. There are many other factors which by themselves should be grounds for refusal and these are listed after the main document. Finally, we demonstrate the inadequate nature of the developer's documentation by a detailed consideration of their Design and Access Statement and their Walk Time Survey.

Introduction

This application is the second application made by Try Homes to develop the Campion House site. Although we shall make occasional references to the first application, it is clearly important that every application stands on its merits. We think that an application should not be viewed favourably because it can, in some respects, be considered as an improvement on a previous one. While we consider this application would be extremely harmful to the area it is clear that the harm would be marginally lessened by the reduction from 273 to 239 homes. On the other hand, we think that the design changes to the north and south elevations make them look even more prison-like than the first application. What matters is whether this application is appropriate and fitting as it stands. No one will thank a doctor who prescribes an incorrect medicine twice but manages to do so with a marginally smaller dosage on the second occasion. That is how we feel about this application.

We are aware that lack of consultation is not, regrettably, in itself grounds for refusal but it is a "material circumstance" and, as such, would be an important factor if the case were to be considered by the Planning Inspectorate. More generally, a failure to consult properly is usually a good indicator that there are other problems.

We have not yet provided full references to planning documents to support all our points but will try to do so before the application is considered by the SDC.

We have produced supporting papers on a number of major aspects of this development which give detailed support for claims made in this paper. We understand that councillors are busy people and that the amount of time different councillors will be able to give each application will vary. We have therefore decided to supply references to additional supporting papers on our website, rather than risk overloading councillors with yet more documentation. If downloading material from our website is a problem then we are more than willing to send copies of the documents.

1.Design Matters

- 1.1 **The main building is out of character with that established by the surrounding housing** in terms of its density, height, length, massing, style, and materials. The opposite side of Thornbury Road (facing the front of the development) consists mainly of two-storey houses most of which are of architectural interest being good examples of Arts & Crafts and Edwardian design. There is also a small modern block of flats which is no higher than the houses. It is set well back from the road and does not disturb the overall character of the north end of Thornbury Road. The 105 metre long frontage of the main building, broken only by the entrance to the courtyard, would present an alien view. Even through this gap the view would only be onto the building at the back of the courtyard. It would be significantly higher and vastly longer than anything else in the street without any significant visual relief to the dominating effect that it would have. [IMP 5.1, ENV-B.1.1, ENV-B.1.2, ENV-B.1.3, PPS1 para 13]
- 1.2 **The main building would be inconsistent with Thornbury Road as a whole**. Thornbury Road is a long one running from the A4 to London Road. The street is very diverse architecturally and includes cottages from the 1830s to family houses constructed in the 1990s. Despite the diversity, there is a unity in terms of scale, skyline, open spaces and predominant colours. The housing is overwhelmingly two/three storey family houses. There are also some small blocks of flats. All of these have been built to respect the scale of the housing and most of them fit in with the dominant design forms. There are larger and smaller houses and flats but none assume a position of overwhelming domination. The proposed main building would be quite unlike anything else in the street in terms of scale, style and materials. Some examples of the architectural styles of Thornbury Road are given in **Appendix A**.
- 1.3 **The main building would be harmful to the Spring Grove Conservation Area**. Apart from its intrusive architectural quality and the contrast with housing in its immediate vicinity no other residential development on this scale exists in the area. The only buildings on this scale are institutional and not principally residential¹. The change from institutional/residential to purely residential use should have entailed reducing the scale of the buildings and opening up the vistas along and across the street but the developer has done the opposite. [ENV-B.2.2, ENV-B.2.8]
- 1.4 **The side and rear elevations of the proposed building are particularly inappropriate**. While there has arguably been some alleviation to the plainness of the frontage of the main building in the second application as compared to the first, the situation with respect to the other elevations is the reverse. They have become plainer and more prison-like. This lack of consistency shows a lack of concern for details which makes the design unacceptable in general terms and even more so in a conservation area. The developer's drawings of the front and side elevations of the main building are reproduced in **Appendix B**.
- 1.5 **The residents of the development would not be provided with the minimum recommended private amenity space**. This is admitted in the developer's application papers (even though we believe their calculations fail to present the true picture). This is said to be offset by the "dual use" nature of the public open space. Open space is either private or public and planning guidance makes it clear that these should be distinct. The developer's reference to "dual use" is therefore spurious. The short-changing of future residents on private amenity space is one among many signs of over-development. [H4.1]

¹ *The only exception is the development of Lancaster House on the Brunel site. Since this building is of architectural interest, is set well-back from the road, and is a well-established part of the street view the same considerations do not apply as in the case of the Champion site.*

- 1.6 **The density of the development is so much greater than that of the surrounding housing that it is impossible for it to properly respect the context of the development.** The density of housing on the opposite side of Thornbury Road is 27 dph. That of the entire catchment area for the development is around 44 dph (this includes some relatively high density housing in Oakley and Kilberry Closes which are not in the Conservation Area). Even if we were to calculate the density for the Campion development using the whole site area of 3.26 ha (thereby minimising density) the result is 73 dph. PPS3 is clear that only land directly associated with the housing should be used and not the whole area of the site. Therefore the real situation is far worse. If 1 ha is set aside for public access then this should be discounted from the area used for density calculations. We then get a density of $239/2.26 = 106$ dph. We understand the need to increase London's housing density. We accept that a development on this site will contribute to that. We believe, however, that respect for context requires that this increase should be moderate. The change from 27 dph on one side of the road to 73/106 dph on the other is not a moderate increase. [H4.2, H7.1]
- 1.7 **The residents have no ownership of the design.** The developer's consultation exercise at the pre-design stage for the first application was a farce in which no attempt was made to get an informed response from residents. There was no consultation on the design that was eventually submitted for the first application. There has not even been a pretence of consultation either pre-design or otherwise for the second application. [PPS1 paras 12, 13.1]
- 1.8 **The A block to the north of Campion House, while not of an inappropriate scale, prevents a view on to the the public open space from the street** thereby rendering that space unattractive and therefore unviable and probably unsafe. In addition the gap through which the open space might be viewed is further blocked by a badly sited bin store which detracts from the view of Campion House. [ENV-N.1.10, IMP 3.3, ENV-B.1.1, ENV-B.19]
- 1.9 **The Developer's Design and Access Statement does not meet the requirements of the DCLG or the recommendations of CABE.** Design and Access Statements are now mandatory (they were not at the time of the first application). Their purpose is to make clear in non-technical language the motivating ideas and approach behind the application, the manner in which the proposed design was reached, and to give a clear idea of the way the proposed development would fit in with its context. It is recommended that, where appropriate, three-dimensional drawings should be included including a view from the eye-line of a bystander. None of this is attempted in the Try Homes document. A more detailed analysis is included as **Appendix D**.
- 1.10 **There is insufficient information about the materials to be used.** Attention to details is essential and that should include details on the materials, types of surfaces and colours to be used. There is virtually no such information and even more to the point there is no information on such things as the materials to be used for windows and exterior doors. While such issues are clearly problems we have not focused on them because we consider the design overall so inappropriate that we do not believe that any amount of attention to detailed matters of this sort could make it acceptable. The relevance of the point here is that it is one indication amongst many of the developer's lack of concern to ensure that the development is appropriate to its context.
- 1.11 **The design is inappropriate for a suburban area consisting of mainly family homes.** It is possible that a design similar to this could be suitable for a town centre. It is not appropriate for the suburban setting in Thornbury Road. Contrary to what Try Homes told residents in their "consultation" of November/December '05, this development is for mainly non-family accommodation. This not only would produce an imbalance in the street and in the area as a whole but would be likely to make the relatively few family homes on the site an unattractive proposition for families looking to buy a home in the area. The family houses are part of the main block and as such would be far less attractive to home buyers than the style of housing

elsewhere in the area. This would be likely to undermine the idea.

- 1.12 **There are too few houses compared to flats in the proposed development.** There are 21 houses as compared with 218 flats. In other words the ratio of flats to houses is more than 10:1. This is many times in excess of the ratio established by the housing in Thornbury Road and even more in the conservation area as a whole.
- 1.13 **The development has gates at all access points to the open space.** There is therefore the possibility that it will become a gated development. The gates to the main courtyard are not shown in the front elevation.

2. SUSTAINABILITY

- 2.1 **The proposed loss of 10% of designated open space is unacceptable.** The cumulative effect along with other developmental erosions would contribute to a continuous downward trend which, if continued, would render policies aimed at preserving open space a dead letter. [ENV-N.1.11, H4.5, PPG17 paragraphs 10, 17, 33]. We have not had time to examine the detail but we suspect that the actual encroachment is much more than the 10% claimed by the developer. Experience has shown that their estimates have a tendency to err in a direction favourable to their case.
- 2.2 **The developer's claims that 2 hectares of space has been made available for public access is incorrect,** since this figure includes areas which are clearly not for public access (contrary to the developer's claim), such as the courtyards and the area at the back of the building (south west corner) which would not be suitable for a public access function. [ENV-N.1.11]
- 2.3 **The so-called public park is so small and so badly situated that it would not be viable.** There would be only a minimal view onto the public space from the pavement. Such a shielded space is an invitation to unwanted activities. There would be overlooking from the housing of Terrace 1 and the North sides of Blocks C and D along with Campion House, but it is unlikely that this would be sufficient to deter such activities. Certainly it would not be enough to encourage members of the public to walk to the space from Thornbury Road. It is sufficient to ask "Who would use the space and for what?" to realise that this space is likely to experience problems and that the residents would very soon ask for the gates to be closed to prevent further access i.e. the space would cease to be publicly accessible. [ENV-N.10]
- 2.4 **The quality of the open space would be seriously degraded by the proposed development.** The large semi-basement car park would not allow sufficient soil depth for trees to grow in the courtyards which is why the replacement 'trees' are actually potted plants. [ENV-N.1.11]**The site includes a sports pitch.** The developer has contested this but Sport England does not agree. Moreover, satellite photographs show clear the goal posts at each end of the pitch at the time of the closure of the seminary (they were subsequently removed). Many residents have children who played on the pitch. The contention that the site has a sports pitch, is therefore, at the very least, a matter that should have been given due consideration. PPG17 requires that, in these circumstances "Developers will need to consult the local community and demonstrate that their proposals are widely supported by them". This has not happened. In fact, the issue of the sports pitch was never raised with local residents by the developer, just as they were not told of the extent of locally designated open space on the site.

- 2.5 **The proposals have not adequately considered problems of biodiversity.** According to PPS9 (para 99) *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, **is established before the planning permission is granted**, otherwise all relevant material considerations may not have been addressed in making the decision.”* The advice received so far is that that protected species have been observed on the site and that further examination of the site is required and that some of that work should be done between May and September 2007. The loss of the existing pond and of at least 60 mature trees without equal quality replacement would be clearly harmful to biodiversity.
- 2.6 **Try Homes' claims that the area to the west of the site is “currently of limited valued” and “no significant ecological interest”.** Apart from the animal life that it sustains this part of the site is a large area of natural soakaway. As such it is difficult to see how the Try Homes' claim can be sustained, especially since all the required site surveys have not yet been carried out.
- 2.7 **The noise assessment considers only the impact of noise generated outside the development.** It does not consider noise generated within the development and the consequential acoustic requirements for residents not to become a source of annoyance for each other. The acoustics of the main courtyard also need to be considered. The height of the proposed building would mean that each side of the courtyard would become a significant reflecting surface. What would be the consequence of one open window and an overloud radio or television? If it becomes clear that the car park requires mechanical ventilation the fan capacity would be very large and the plant noise impossible to attenuate to acceptable levels for residents, especially at times of low background noise.
- 2.8 **The analysis of water management for the site is inadequate.** The impact of the development on the foul water system has not been considered. The original foul water sewer along Thornbury Road has had many additional pipes added to it over the years. The system should be professionally appraised before a significant new load is added. Try Homes says “Thames Water have raised no objections”. What was Thames Water asked to assess? The proposed surface water run-off into the main surface water sewer is unacceptable. There are no proposals for handling grey-water on-site. With all that we now know about water problems this must be regarded as unacceptable.
- 2.9 **A flood risk assessment has been provided for this application.** We do not have the expertise to assess it. However, given the unreliability of several other reports/analyses provided, we hope that the Planning Officers either have the required expertise, or will commission an independent assessment. We already know of significant flooding problems at the south end of Thornbury Road. Despite extensive work by Thames Water these problems persist. During heavy storms the gullies overflow and on occasion the water has included excrement. A foul smell has covered the area at such times.

Traffic/parking

- 2.9 **The development would be detrimental to the flow of traffic along Thornbury Road.** Thornbury Road is already experiencing significant traffic stress at peak times. For example the tail-back onto the A4 often reaches beyond the entire frontage of the Champion House site (sometimes as far as Kilberry Close). Providing four access/egress points and the likely volume of traffic from 239homes is bound to exacerbate an already difficult situation. [T4.3] The analysis commissioned by the developer admits that the junction of Thornbury Road with the A4 would become saturated, but simply accepts this as a result of the development and not as a problem requiring a solution.

- 2.10 **The development would be harmful to public transport.** This follows from the reasons given in 2.9. [T1.3]**The development would be detrimental to road safety.** This also follows from 2.9. An additional point is that Church Road and the top end of Thornbury Road are designated cycle routes. The truth is that Thornbury Road is already so difficult for cyclists that the majority of them take to the pavements. More access/egress points are bound to increase the number of hazards. This development, along with that at Brunel, will increase the pressure along Church Road which is used by children walking and cycling to school. [T4.3]
- 2.11 **Residents without garages would be seriously disadvantaged by the development.** Some residents along Thornbury Road do not have off-street parking. The inevitable prevention of parking in front of the site plus the large increase in population will increase parking pressure on the other side of the road. Residents opposite will find their ability to park a convenient distance from their homes significantly reduced. [ENV P.3, H 1.1, H 6.4]
- 2.12 **An underground car park on this scale would be unsafe.** What is proposed is a *very large* semi-basement car park (with 239 parking lots it will have roughly double the capacity of the Osterley Station car park). Even with good lighting/ventilation and surveillance cameras it is likely that incidents will occur. When they do many people will become afraid to use the facility. That will add to parking pressure on the streets and will lower the residents' feeling of security. [ENV-B.1.9]
- 2.13 **The underground car park could not be naturally ventilated.** This is contrary to the claim that this development will not require artificial ventilation. This is demonstrated by the existence of venting shafts from the garage which would require extractor fans. It is also unacceptable that these vents feed fumes into the space enclosing the gardens for the terraced houses. In fact the vents would surface next to some of the gardens.
- 2.14 **The increased pressure on street parking would result in more applications to convert front gardens to private parking space.** The negative visual impact of gardens already lost is clear. Beyond that the environmental damage caused in terms of surface water run-off into the main sewers is now well understood. In a development on this scale it is likely that some residents would have commercial vehicles in addition to their private car. Where would such vehicles be parked?
- 2.15 **There is no information on the way in which the site parking will be managed.** If residents are required to pay then this will be another factor leading to parking pressure on local streets.
- 2.16 **The developer's response to the LBH sustainability checklist is so self-evidently inadequate that little comment would seem to be required.** The answers to many key issues are so vague that it is impossible to work out what the developer intends to do. Thus there is (i) no commitment to contributing to local employment opportunities, (ii) no information is given on the maximising of solar gain, (iii) the question “Will the building include artificial air conditioning and ventilation?” is not answered (the answer is “yes”), (iv) the papers appear to claim that there would be a net reduction in surface-water run off but this is clearly untrue from the drainage details, (v) virtually no information on the choice of materials to minimise environmental impact, (vi) no information on the choice of materials to promote the longevity of the development or for the purpose of attenuating temperature change by use of high density materials, (vii) no information on the storage of recyclable waste within each housing unit, (viii) no information on how the development will affect the aesthetics of the surrounding town landscape, (ix) no response to the question about known demand for housing in the area. [LP 3A.4]
- 2.17 **The developer has not considered the cumulative impact of their proposals along with those, already approved, for the Brunel site** where 366 homes will be built. The proposal to build 239 homes would along with those at Brunel produce an increase of 40% in the

number of homes in the Spring Grove Conservation area. While we accept the need to provide more housing, doing so in a conservation area requires even more sensitivity than is normally required. An increase on this scale will have consequences on a wide variety of fronts e.g. Density of people, demands on services, provision for children, schools, health, social services and so on. There is no sign that the cumulative impact of this with other developments has been considered. In other words, the sustainability of the local community has not been considered.

3. CONSULTATION

- 3.1 **We have pointed out at various places in this document that there has been no real consultation in connection with this development.** We believe that this is well documented and that the developer's attitude to local opinion is well demonstrated by pursuing an appeal on the first application. That application was overwhelmingly opposed by residents, it was shown to be fundamentally flawed by the planning officers and it was unanimously rejected by the councillors on the Sustainable Development Committee. Despite that Try Homes is saying that it believes it to be a good application and they hope to get it passed by the Inspectorate. It is clear that in that case they would go ahead and build despite clearly demonstrated local opposition at every level. Where exactly is the concern for local opinion in all this?
- 3.2 Our analysis of the developer's so-called consultation showed that it failed in every important respect. Residents were not given essential background information despite requests for it to be provided, they were not offered alternatives in terms of design, the discussions that took place were therefore not properly informed. After all that the analysis of the feedback obtained was spurious and misleading in the extreme. An analysis of all this was contained in our Black Book feed back on the first application. It is also available on our website:

<http://campionconcerns.org.uk/blackbook>

4. THE APPLICATION PAPERS

- 4.1 **The application papers are inadequate in that they do not provide all the information required for a development of this sort.**
- 4.2 **The main supporting document contains a number of significant errors and shows every sign of having been completed without due care.** This alone means that they do not make a convincing case for an application of this scale.
- 4.3 **The assessment of the conservation area makes no attempt to assess its established character.** The comments on the area and its history are overwhelmingly negative. This is no basis for making a development that will preserve or enhance the character of the area. The photographs provided are further evidence of the developer's failure to consider the special qualities of the area seriously. *We recommend that members obtain and read the Developer's Conservation Assessment document for themselves.*
- 4.4 **The traffic assessment contains incorrect information and is based on dubious assumptions.** Vital junctions such as Church Road/Thornbury Road are not included in the TA. It is assumed that all services are within walking distance but no good reason is given for

believing this wildly improbable view. There are many mistakes. For example the pavement is said to be 3.0 m wide. In fact it is 2.7 m wide. This is a 10% error and is typical of the tendency throughout all the application papers to bend the facts. *No figures in the reports should be taken on trust.*

- 4.5 **The Landscape and Visual Statement.** The tree survey was not done to the current standards (BS5837 – 2005). The report is described as an “initial Arboriculture Survey” which suggests that a detailed report should have been forthcoming. The main document (by Lovejoy) makes claims which cannot be supported. Thus the courtyards do not provide open space of equal quality to that existing. The report says that mature and semi-mature trees should be kept but in fact some would be removed by the proposed application. According to the map showing tree root protection areas one of the Lebanese cedars would appear to be threatened by the proposed building. Given the loss of trees, of a pond and of what would be vastly increased human activity on the site, claims of biodiversity being 'enhanced' by the development are not credible.
- 4.6 **The Statement of Community Involvement.** We have commented on this at length in our “black book” in response to the first application. Nothing has changed on this for with respect to the second application. Suffice to say that (1) there was no serious attempt to consult the residents, and (2) residents have made it clear that this is their view (by letters, by petition, and at the developer's exhibition of 10th July 2006).
- 4.7 **The Walk Time Survey ignores established standards** in an attempt to prove that the Town Centre is within “easy walking distance”.
- 4.8 **The Energy Report does not even attempt to consider some of the possibilities that it lists.** Thus the provision of combined heat and power is rejected on the grounds that it would lead to “heat dumping” without considering how that heat might be used by nearby institutions (Osterley Library, Isleworth & Syon School) or even adjacent housing. Other possibilities are dismissed without any real reason being given. The information about the proposed solar water heating panels is also rather vague. Which flats/houses would benefit from this water (which requires them to have a hot water storage tank)?
- 4.9 **The Design and Access statement does not meet the requirements of such statements** (dealt with above and also in **Appendix D**).

5. FINAL COMMENT

The Draft Planning Position produced by Hounslow's planning officers Statement for the Campion House site made the main issues for the development clear. These were as follows:

6.1 Any form of future redevelopment of the site should meet the following criteria having regard to the planning assessment framework referred to in Section 4.0 of this Planning Position Statement:

- *Make the best use of previously developed land;*
- *Protect the appearance and setting of Campion House, a Building of Local Townscape Character, and the Grade II listed statue known as Ghost or Descent from the Cross;*
- *Ensure that any works respect the integrity of Campion House;*
- *Ensure that any works preserve or enhance the character or appearance of the Spring Grove Conservation Area;*
- *Safeguard the existing Local Open Space from encroachment by built development and seek to*

improve its amenity value and provide improved public access to, and usability of, the Local Open Space;

- *Ensure that the Local Open Space and Campion House are well maintained and managed with a view to securing their long term viability;*
- *Protect and maintain existing trees as appropriate and seek to increase the stock and range of trees on site;*
- *Ensure that any new development and activity on and associated with the site does not result in a loss of amenity to surrounding residents or in conditions prejudicial to highway and pedestrian safety;*
- *Demonstrate that provision is made for disabled people (e.g. would be built to mobility standards, with access and facilities for people with disabilities, including pedestrian access and car parking); and*
- *Take account of sustainable development objectives.*

We think that these were the right issues to identify. It is a matter of regret that the current application falls foul of the planning guidelines referred to in that statement in so many cases. The developer has made no serious attempt to comply with guidelines where these were in conflict with the aim of maximising the number of housing units. Furthermore, scant concern has been shown for the Spring Grove Conservation Area.

We believe that for an application on this scale, in a conservation area, to succeed, it is vital that there should be genuine consultation with the local community. Residents should be treated as genuine partners in the discussion about what might constitute an appropriate design. We understand that the developer must make a profit. The developer must understand that we want to have a development that we are happy to live with. Meeting both objectives requires a real dialogue. For our part we are ready to take part in that process and we are confident that the evidence shows that we speak on behalf of the majority of residents in this. On the other hand, we are not willing to continue a dialogue so long as it is clear that the developer's overriding concern is to maximise the number of housing units irrespective of the impact on the local community.

Note on the Officers' Recommendation on the first application. We have reproduced the Officers' Recommendation as **Appendix F** for convenient reference. It is our view that the majority of the objections raised by the officers remain valid for the second application. We have underlined the sections of the recommendation that we believe apply equally to the current application.

