

# **Campion Concerns Monitoring Group**

101 Thornbury Road, TW7 4NL, Tel: 020 8847 0008/020 8568 4494

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**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78  
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 – SECTION 20**

**TOWN AND COUNTRY PLANNING APPEALS (INQUIRIES PROCEDURE)  
(ENGLAND) RULES 2000**

**Statement of Case of the  
Campion Concerns Monitoring Group  
(As a Rule 6 Party)**

**In respect of**

**The Application of Try Homes  
To Develop the Campion House Site  
Thornbury Road  
Osterley TW7 4NN**

**Case Reference Numbers:**

**APP/F5540/A/07/2040494/NWF (Planning)  
APP/F5540/E/07/2040493/NWF (Conservation Area)**

**23<sup>rd</sup> May 2007**

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# The Champion House application: arguments for refusal

## SUMMARY

*The development of the Champion House site presents a major opportunity not only to preserve the character of the Spring Grove Conservation area but also to enhance it. To do that, its design would have to be consistent with the suburban, open and green character of the Spring Grove Conservation Area in which the site is situated.*

*The surrounding buildings are predominantly low-rise family houses. There are some small blocks of flats which, on the whole, fit the general character of the area. The proposed development would neither preserve nor enhance the area. Its scale and form would be out of character with the area and would, as a result, detract from that character both as a building and as a consequence of its overall impact.*

*The buildings to be replaced do not contribute to the character of the area. The development of the site would provide a clear opportunity to enhance it. Unfortunately, the proposed main block would maintain and re-inforce some of the most unsympathetic features of the buildings they would replace. The planning guidelines which we believe support our case are indicated below in square brackets. We will provide detailed background information, arguments and references in our evidence.*

*The scale and layout of the proposed development preclude the possibility of enhancing/preserving the character of the area. Without reducing the scale and taking a different approach to design it will not be possible to:*

- A) build in a way that is consistent with the character of Thornbury Road;*
- B) provide buildings that are consistent with the Spring Grove Conservation Area;*
- C) respect the need to preserve the area's Locally Designated Open Space;*
- D) develop the site in a way which meets the legitimate concerns of the local community.*

*We support the case made against the application by the London Borough of Hounslow in its Statement of Case and would wish to be able to call on the documents listed in in that Statement. We would also wish to be able to make reference to the planning guidelines referenced by the LBH in support of its case.*

# 1. THE APPEAL SITE & ITS IMMEDIATE ENVIRONMENT

*Notes additional to the site description in the London Borough of Hounslow Statement of Case.*

- 1.1. The area of the site is marked on the planning authority's map as 3.26 hectares. Of this area 2.1 hectares is Locally Designated Open Space. The 3.26 ha area includes a building referred to as the "gate lodge". The application says that this building is not to be demolished. This house, known to residents as 104 Thornbury Road, is not owned by the applicant. It is privately owned by its long-term occupants who would be more than a little concerned if demolition were to be considered.
- 1.2. The seminary block which was erected in 1963 (before Conservation Area status was conferred on the the Spring Grove Conservation Area) was designed in a way which is unsympathetic to the local area and is of little architectural interest.
- 1.3. The seminary block has accommodation for about 80 students. In recent years the numbers declined to the point where the site became unviable prompting the then owners (The Society of Jesus) to put it up for sale.
- 1.4. The site includes two sports areas: (1) a sports pitch/football pitch; (2) a tennis court/netball court. The sports pitch was used by local organisations and by schools, local residents and their children, as well as by the occupants of the seminary.
- 1.5. The applicant argues that the suburban status of the site and its low PTAL rating (2) should both be questioned. The suggestion is that in both cases the real status and rating should be regarded as marginal. In the case of the suburban status it is claimed that the town centre is within easy walking distance. We will show that this is not the case by reference to distance and standard walking times. The PTAL rating (2) has been confirmed by Transport for London. The applicant's Traffic Analysis confirms that the town centre is more than 15 minutes walk from the site.
- 1.6. The density of the surrounding built environment arises from its character as an area of mainly family houses and some small blocks of flats. The density of the housing along Thornbury Road is about 33 dph. There are 27 homes along the section of Thornbury Road facing the site.

## 2. THE SPRING GROVE CONSERVATION AREA

- 2.1. **The conservation area is characterised by low-rise family housing and has a morphological focus arising from the Davies Plan.** The core of the Davies Plan is the network of streets between London Road in the south, the A4 in the north, Thornbury Road to the west, and College Road to the east. The Davies Plan radiated out from the area around Spring Grove House and included The Grove, Osterley Road, Eversley Crescent and Thornbury Road. About 25 houses built for the Davies estate remain and are an important feature of the area. Thornbury Road includes cottages from the 1830s and a listed building (Osterley Mansions).
- 2.2. **The character of the area owes much to the Davies Plan of the 1850s.** Thornbury Road was one of the main routes of the Davies Plan and as such contained many of the Davies Houses (3½ storey mansions). Some of these were demolished from the 1960s to the 1980s. Some of the replacement buildings would not have met the requirement to “preserve or enhance” the area had that been in force at the time. On the positive side some fine housing was built in the early part of the twentieth century so that the housing running along the opposite side of the road to the site has contributed significantly to the quality and character of the area.
- 2.3. **The scale of the development would represent an over-development for Thornbury Road and also for the Spring Grove Conservation Area.** This case will be argued by the the London Borough of Hounslow in terms of the nature of the buildings. Another reason is that the increase in the number of homes and therefore of the population of the area would, when taken in conjunction with other developments at present under way, lead to an increase in homes/population (approaching 40%) which could not but have a profound impact on the conservation area putting its character at risk.

### 3. THE PROPOSED BUILDINGS

- 3.1. **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 including some good examples of Arts & Crafts and Edwardian design. There is also a small modern block of flats (Fairacre) which is no higher than the adjacent houses. It is set well back from the road and does not disturb the overall character of the section of Thornbury Road leading to the A4. The long frontage (extending over 105 metres with a 5 metre gap) of the main building would dominate the view along the road. It would be significantly higher and vastly longer than anything else in the street without any significant visual relief. [IMP 5.1, ENV-B.1.1, ENV-B.1.2, ENV-B.1.3, PPS1 para 13]
- 3.2. **The main building would be harmful to the Spring Grove Conservation Area.** Apart from the stark contrast between the proposed main building and 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 residential<sup>1</sup>. 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 applicant has done the opposite. [ENV-B.2.2, ENV-B.2.8]
- 3.3. **The residents of the development would not be provided with the minimum recommended private amenity space.** This is admitted in the supporting papers for the application. 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 Hounslow SPG says that design should “ensure there is defensible space around buildings, making a clear distinction between public and private areas”. The applicant’s reference to “dual use” confuses public and

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<sup>1</sup> *The only exception is the development of Lancaster House on the former 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 Campion site.*

private space. The short-fall of private amenity for future residents is one among many signs of over-development. [H4.1] [SPG 3 1.1.1]

- 3.4. **The density of the development fails to respect that of the surrounding built development.** The density of housing on the opposite side of Thornbury Road is about 33 dph. That of the entire catchment area for the development is around 44 dph (this includes some relatively high density housing in Kilberry Close which is not in the Conservation Area). Even if we were to calculate the density for the development using the whole site area (thereby minimising it) the result is 73 dph. In fact, as the PPS3 definition of density makes clear, the whole site area should not be used and therefore the proper value for density is much higher. [H4.2, H7.1]
- 3.5. **The residents of the area are opposed to the scale and layout and design of the proposed main buildings.** The applicant's consultation exercise for the first application to develop the site failed to either inform the residents appropriately or to involve them in the design process. There has been no consultation exercise for the current application. It has been claimed that the applicant made changes to the design for the first application in response to residents' comments. That claim was never put to the test of showing residents the proposed changes and asking for feedback. The applicant declined to organise an exhibition for the second application. It was assumed that placing a complex package of papers and drawings in a box in the local library was sufficient. [PPS1 paras 12, 13.1]
- 3.6. **The A block to the north of Campion House is of an appropriate scale and design. However, it would prevent a clear view on to the public open space from the street.** This lack of a direct view onto the area will discourage members of the public from accessing it. [ENV-N.1.10, IMP 3.3, ENV-B.1.1, ENV-B.19]

## 4. OPEN SPACE INCLUDING PUBLIC OPEN SPACE

- 4.1. **The proposed loss of 10% of designated open space is unacceptable.** The current open space is of a good quality in that it has been maintained and supports a great deal of vegetation and wildlife. Encroachment on open space is contrary to planning guidance at national, regional and local level. The cumulative effect of open spaces loss on this site, when taken along with other open space losses due to previous developments, would contribute to a continuous downward trend in total open space which if not halted would render policies aimed at preserving open space a dead letter. [ENV-N.1.11, H4.5, PPG17 paras 10, 17, 33]
- 4.2. **The applicant's claim that 2 hectares of space has been made available for public access.** We would contest this since this figure includes areas which in our view would not be appropriate for public access such as the courtyard and the frontage of the blocks D, E & F. [ENV-N.1.11]
- 4.3. **The quality of the open space above the car park would not be of the same quality as the open space replaced.** The soil would be that of a roof garden system and would therefore not be able to bear the same range of trees. (We have no information as to its depth and do not know if it could bear any trees at all.) Furthermore, unlike the space replaced it would require artificial irrigation. Finally a significant proportion of the area could be hard surface rather than green surface. [ENV-N.1.11]
- 4.4. **The site includes a sports pitch.** The applicant has contested this but Sport England does not agree. Moreover, aerial photographs show clearly 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. [Sport England Statement, PPG/S on sport/recreation, Google picture]

## 5. TRAFFIC/PUBLIC TRANSPORT/HIGHWAYS

5.1. **The Transport Analysis (TA) carried out to support this application is flawed in our view:**

- The scope of the TA was too narrow (e.g. vital junctions were not included)
- Some assumptions used do not reflect the actual local situation (e.g. those about the distance and availability of local services, buses etc)

Therefore any resultant traffic/public transport/highways proposal would also be flawed if it is based on the TA.

5.2. **The walk-time survey map produced by the applicant shows that all the primary schools serving the site are all more than 800 m away, some considerably more.** These schools are already at or near full capacity. A development on this scale would therefore generate a significant increase in car trips at peak times.

## 6. ENVIRONMENTAL ISSUES

Environmental aspects of the development have not been approached with the thoroughness that these issues now require. There is insufficient information on recycling of waste both for the development as a whole and within individual homes.

- 6.1. The inclusion of water features and living roofs for water management purposes was rejected on the grounds that they are precluded by the Civil Aviation Authority Advice Note 3. That advice does not preclude either measure. It suggests that precautions should be taken if either are to be part of a development within 13 km of Heathrow. 'The lack of water feature and removal of the long standing pond (with fish) on site adds to the reduction of biodiversity on the site
- 6.2. **There are no proposals for the management of the use of grey water or for rainwater harvesting on the site.** Careful management of water resources is now essential for developments on this scale. [London Plan Policy 4A.11]
- 6.3. **There are no plans to avoid an overall increase in the total water runoff from the site.** This is contrary to advice in the London Plan. According to the Hounslow advice to the construction industry "SuDS are a flexible series of options that allow a designer to select those that best suit the circumstances of a particular development. It is essential that these issues are considered at the earliest point of the design stage". (Emphasis added) [London Plan Policy 4C.8, Hounslow Sustainable Guide for the Construction Industry, Chapter 5]
- 6.4. **The proposed car park could not be naturally ventilated as claimed.** The dimensions and design of the garage would not allow for sufficient wall openings around the garage to meet the requirements for natural ventilation. The ventilation shafts from the car park which could carry noxious fumes will exist by residents gardens in an enclosed area. This would be likely to be both unpleasant and unhealthy.
- 6.5. **The southern cedar along the frontage would be endangered by the proximity of the proposed building.** The landscape document shows the root system of this tree being encroached on by the building structure.

## 7. THE APPLICATION PAPERS

Two of the support papers which accompany the application are particularly weak: (1) the appraisal of the Spring Grove Conservation Area; (2) the Statement of Community Involvement.

7.1. **The appraisal of the conservation area is one-sided in that it emphasises weak points and fails to do justice to its positive points.**

This is not an adequate basis for designing a development that will preserve or enhance the character of the area. The photographs provided are further evidence of the applicant's failure to consider the special qualities of the area seriously.

7.2. **The Landscape and Visual Statement.** The tree survey was carried out in compliance with BS5837:1991. The current standard is BS5837:2005. The survey was therefore not carried out in accordance with current standards. Moreover, the survey is presented as initial guidance which would require more detailed work at the detailed design stage. The courtyard does not provide open space of equal quality to that existing. Land supporting a variety of trees would be replaced by a "roof garden system" which would not support tree growth.

7.3. **The Statement of Community Involvement.** The only direct communication with residents in connection with proposals for this site was (1) workshops and an exhibition organised, in November/December 2005, before the first, now withdrawn, application, and (2) an exhibition held at Witham Road in July 2006 also for the first application. The only attempt to involve the local community for the current application since then was a recent exhibition on proposed modifications to the building elevations for the current application. We believe the Statement of Community Involvement to be misleading. At each point when the residents have expressed their views overwhelming opposition to the applicant's proposals have been made clear.

## 8. FINAL COMMENT

The Draft Planning Position Statement produced by Hounslow's planning officers for the Campion House site, when it became available for development, made the main issues for the development clear. Thus in the statement it was explained that in order to respect the area

*“Generally, three- to four- storey development fronting Thornbury Road would be considered appropriate having regard to the scale of existing development on the site, including Campion House, built at 3½ storeys in height, and the three-storey accommodation block to its south – and based on current floor to ceiling standards. However, any new development should be subordinate to Campion House and building heights sensitive to their surroundings, in particular surrounding residential properties.”*

The statement also contained the following comment on open space:

*“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.”*

*“Views into and out of the site – the most important views of the site are of Campion House, with views from Thornbury Road – regard should be given to local views and glimpses in and out of the site with a view to integrating the open space with the surrounding development and providing informal surveillance”.*

The point was made in the statement that the buildings should be adapted to the existing trees:

*“Opportunities should also be explored to incorporate the existing trees into the layout of any new development and to increase the stock and range of trees on site in order to preserve or enhance the character or appearance of the Conservation Area”.*

Generally, the Draft Planning Position Statement set out the key issues for the site especially with regard to the need for any development to be consistent with the surrounding housing and with the conservation area in general.

We believe that for an application on this scale, in a conservation area, to succeed it is vital that there should be thorough consultation with the local community. Residents should be genuine partners in the discussion about what might constitute an appropriate design. We understand that for the applicant the development is a

commercial undertaking which seeks to make a profit. The applicant must understand that residents want to have a development that they will be happy to live with. Meeting both objectives requires a real dialogue. For our part we are more than 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.

## **9. NOTE ON DOCUMENTATION**

CCMG reserve the right to refer to other documents or statements that may arise during the enquiry or presentation of evidence, including cross examination. Also CCMG would like a copy of the decision and recommendations arising from the Inquiry.

In particular we may wish to refer to the documents listed in the Statement of Case provided by the London Borough of Hounslow. In addition we may refer to:

1. **Guidance on Conservation area appraisals** – English Heritage, 2006
2. **By Design**, CABE, 2000
3. **Better Places to Live**, Cabe, 2001
4. **How to do a Design Review**, Cabe, 2006
5. **Design Review**, Cabe, 2006
6. **Creative Spaces/a Toolkit for Participatory Urban Design**,  
The Architecture Foundation, 2000
7. **Urban Design Compendium**, English Partnerships, 2000

In addition we will supply documents and drawings which we have produced in connection with this development where these support a particular point made above.

Some indications of planning guideline references have been provided in this document. More complete references will be provided with our proof of evidence. The evidence will also provide information about the Campion Concerns Monitoring Group, its methods of work and what it has done in connection with the applications to develop the Campion House site.