

APPENDIX 2.2
LBH EIA SCOPING REVIEW



London Borough of Hounslow

Scoping Opinion

The Town and Country Planning (Environmental Impact Assessment)
Regulations 2017 (as amended)

Site Location:	Homebase, Syon Lane, TW7 5QE
Development proposal:	Demolition of the existing buildings, and the construction of a residential led mixed-use development comprising multi-storey buildings, the tallest buildings up to a maximum height of 16 storeys (71m AOD) providing up to 520 residential units, up to 8,500 sqm (gross internal area) of commercial floorspace (Tesco Extra) and flexible commercial use, with car parking
Scoping Application Ref:	00505/H/SCOPE1
Ward:	Osterley and Spring Grove

1.0 Introduction

- 1.1 The following summarises the key points raised by the Local Planning Authority (“**LPA**”) and statutory consultees relating to a pre-application scoping report by Barton Willmore dated July 2019 for St Edward Homes Ltd (“**the Report**”) and received 25 July 2019. It is noted that subsequent to the submission of the Report, the description of the proposal was revised, with the scheme to include up to around 520 dwellings, an increase from the original proposal of around 450 dwellings. The change in the number of proposed dwellings is not considered to affect the recommendations within the Scoping Opinion.
- 1.2 The application site (“**the Site**”) is a 1.5 hectare plot of land at the junction of the Great West Road (A4) and Syon Lane.
- 1.3 The Site is broadly rectangular in shape and slopes downward from its northwest corner to the southeast. It has frontage to both Great West Road and Syon Lane with vehicular access from Syon Lane. At present the site contains a large industrial type building used for retail (A1 use (non-food)). A large area of surface car parking occupies the northern third of the Site. A service lane runs along the rear (southern side) of the Site, with this also providing vehicular access to a number of commercial premises adjoining the eastern side of the Site.
- 1.4 To the east there are commercial and industrial uses. To the south are railway lines with Syon Lane station around 50m to the southwest of the Site. The surrounding area has a mix of uses, with commercial development along the Great West Road and residential development to the northwest, west and south.
- 1.5 The proposal is for the complete redevelopment of the Site comprising the demolition of the existing buildings, and the construction of a residential led mixed-



use development with multi-storey buildings up to a maximum height of 71m AOD (16-storeys), providing around 450 dwellings, up to 8,500 sqm (Gross Internal Area) of retail (Tesco Superstore) and some additional flexible commercial floorspace.

1.6 Owing to the scale of the development, its location and characteristics, including the range of uses, the proposal would fall within the description of Schedule 2 development, under category 10 (b) as an 'urban development project', of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

1.7 The LPA agrees with the applicant's conclusion that the proposed development would potentially result in significant environmental effects, owing to its scale and nature, and therefore an Environmental Statement ("ES") is required.

2.0 General comments

2.1 The Report identifies that the following topics are to be included in the scope of the ES.

- Population and Human Health
- Built Heritage
- Townscape and Visual Effects
- Transport and Access
- Noise and Vibration
- Air Quality
- Daylight, Sunlight, Overshadowing and Social Glare
- Wind Microclimate
- Cumulative Effects and Consultation

2.2 The general methodology and topics to be considered are accepted, subject to the comments made in Section 3.0 of this response, where appropriate, to inform the preparation of the ES and ensure all potential environmental effects are properly identified so as to provide adequate information for future assessment and decision making.

2.3 The ES should include a review of the relevant planning policy framework including emerging policies. The existing Development Plan is comprised of the Hounslow Local Plan 2015, London Plan Consolidated with Alterations Since 2011 (2016) and the West London Waste Plan 2015.

2.4 Both the London Plan and Hounslow Local Plan are subject to proposals for their replacement and revision. The applicant should monitor the progress of the existing draft planning documents through public consultation and/ or examination and make reference to relevant policies according to their status having regard to paragraph 48 of the National Planning Policy Framework ("NPPF").

2.5 Regard must also be had to consultation responses attached to this opinion that were received from relevant statutory consultees and officers of the Local Planning Authority. The list of respondents who replied within the statutory timeframe and



whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 1.

3.0 Environmental Topics

3.1 Population and Human Health

3.2 Scoping agreed subject to the comments below.

3.3 In respect of human health, the intention to address wider human health considerations that fall within the scope of the ES is acknowledged, however the information to be submitted should also consider potential positive effects and outcomes on the health of the existing and proposed population from the development, and this may take the form of a Health Impact Assessment.

3.4 Effects on economic activity and employment need to consider how these relate to the wider planning objectives of the Great West Corridor including provision of affordable workspace and its specialist strengths in the media and digital sectors. It is noted the Great West Corridor has been as a Creative Enterprise Zone (“CEZ”) with the purpose of promoting new creative clusters and workspaces, provide employment and training for local people and strengthen the already thriving creative economy in Hounslow. Effects on the continued operation of adjacent uses and potential uses that accord with the adjacent site’s proposed designation as Strategic Industrial Land (“SIL”) also need to be addressed.

3.5 Built Heritage

3.6 Scoping is generally agreed, subject to a detailed explanation of the methodology used to produce any visual representations of the proposal within the townscape and setting of heritage assets. Viewpoints selected should consider those identified in Conservation Area appraisals, London Borough of Richmond’s Proposals Map, Thames Landscape Strategy, Royal Botanic Gardens World Heritage Site Management Plan and the Great West Corridor View Appendix (July 2019) (<https://hounslow.app.box.com/s/0autr85isskhfiq3rnmsgwuhya5fs9e>).

3.7 In addition to the conservation areas referred to at 1.11 of the Report, consideration must also be given to Osterley Park and Spring Grove Conservation Areas. At 4.2 of the Report it is stated that there are no designated or non-designated heritage assets on the Site. Although this is statement is accurate your attention is drawn to recent requests for locally listing and statutory listing of the existing building on the Site. In light of such requests it is recommended that the heritage significance of the building, in particular its architectural interest or otherwise, is addressed. The list of designated heritage assets to be considered is agreed.

3.8 Townscape and Visual Effects

3.9 Scoping is generally agreed, subject to a detailed explanation of the methodology used to produce any visual representations of the proposal within the townscape. For longer distance landscape views it is recommended that the methodology



consider the Landscape Institute's guidance (Photography and Photomontage in Landscape and Visual Impact Assessment – TGN Draft 2018-06-01). Tilt-Shift lenses should only be used when the standard range of lenses have been ruled out due to the verticality of the development.

- 3.10 In particular, any Actual Visual Representations should be annotated to ensure that it is clear what lens was used for the photography and if the images have been cropped or the photographer has applied tilt, vertical rise or horizontal shift during the taking of the shot. As such Images produced with the tilt shift should be stated as such and be presented with clear markings on the image to identify the point of perspective.
- 3.11 The viewpoints identified in paragraph 5.15 of the Report correspond with the views to be considered to establish effects on the setting of heritage assets. One additional viewpoint has been identified as needing to be reviewed to determine if further assessment is needed as follows:
- Deer Park close the Kew Observatory (view towards the Site)
- 3.12 **Transport and Access**
- 3.13 Scoping is generally agreed, however the assessment and supporting information must address the following issues which reflect comments from Transport for London ("TfL") and the Council's Transport section. It is noted that the ES shall include cross-referenced information provided in a separate Transport Assessment ("TA").
- 3.14 The car park beat surveys for the Site to be done on a 15 minute basis. Surveyors should identify the location and number of trips associated with Nishkam School as these will need to be deducted from the overall Tesco accumulation given the primary trip purpose is not a foodstore trip.
- 3.15 Turning counts/surveys are to include Homebase and the Northumberland Avenue junction. The access to the Homebase site is very close to Northumberland Avenue so the relationship between the two, including potential for Northumberland Ave to be used as a short cut by local residents to a relocated Tesco, must be considered.
- 3.16 All pedestrian crossings on Syon Lane are to be retained.
- 3.17 A Road Safety Audit for the redesigned access is required.
- 3.18 TfL is the responsible highway authority for part of the road network that immediately surrounds the Site. It is understood that TfL has provided detailed pre-application advice in respect of local traffic modelling for the proposed development in their 'Planning Application Modelling Overview'.
- 3.19 The TA must be prepared in accordance with latest TfL's TA best practice guidance <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>.



Highway Impact Assessment

- 3.20 Local junction impact - Vissim micro-simulation for the Gillette corner junction is recommended to understand projected vehicle trip distribution.
- 3.21 Strategic modelling - Full, multi-modal strategic modelling of the proposals is required to enable a full understanding of the proposals' strategic impact on the transport network; including vehicular traffic, public transport, walking and cycling.
- 3.22 The assessment shall demonstrate how the Mayor of London's 'Healthy Streets Approach' has been addressed and its objectives met.
- 3.23 Car parking levels should accord with the draft London Plan.

Other

- 3.24 In respect of aviation, effects may be scoped out though further liaison with Heathrow Airport (Nats Safeguarding) is recommended. Comments from NATS Safeguarding are attached.
- 3.25 **Noise and Vibration**
- 3.26 Scoping is generally agreed as the proposed methodology is generally in-line with standard industry practice including consideration of on and off-site effects relating the construction and operational phases of the development.
- 3.27 It is noted that noise emissions from any fixed plant and servicing areas with the proposed development will be assessed. This should include both noise from fixed plant related to the development as well as the unloading / loading of goods including the movement of HGV vehicles associated with the proposed commercial space. The assessment should include the effects on both existing and proposed residential receptors.
- 3.28 An assessment should also be undertaken which considers the noise transfer from the internal spaces of the proposed ground floor to the upper residential areas.
- 3.29 It is noted that redevelopment of the nearby Tesco Superstore Development (01106/B/SCOPE1) to the north of the proposed site should be included as part of the cumulative effects of the scheme. It is therefore expected that the construction and operational noise assessments will consider these effects accordingly.
- 3.30 When considering suitability of site for the proposed development (NPPF), consideration should be had for layout in regards to noise sensitive uses, plausibility of mitigation measures against multiple noise sources (road, rail & aircraft), including noise from plant (ventilation), giving due consideration to overheating under the new guidelines TM59.
- 3.31 Aircraft noise from the north runway at Heathrow should also be taken into account.



3.32 Air Quality

3.33 Scoping is generally agreed subject to consideration of the agreed traffic modelling scenarios. The proposed methodology is generally in-line with standard industry practice including consideration of on and off-site effects relating the construction and operational phases of the development. The following must also be included within the assessment;

- Inclusion of the Tesco Superstore Development (01106/B/SCOPE1) to the north of the proposed site within the cumulative assessment;
- Identify receptors to be included within the assessment, both construction and operational phase.
- When assessing impacts on sensitive receptors and considering approach to mitigation, use significance criteria specified in 'London Councils Air Quality and Planning Guidance', in conjunction with IAQM to assess change in vehicle fleet etc
- Ensure the latest available monitoring data is utilised within model verification (ideally including the monitoring proposed to be undertaken for the 01106/B/SCOPE1 application) ;
- Ensure verification is undertaken in accordance with guidance in Section 7 LAQM Technical Guidance TG(16)
- Ensure consultation with the LBH is undertaken to determine model verification, latest monitoring and to confirm modelling methodology.
- When considering ventilation, passive or otherwise, consideration should also be given to overheating.

3.34 Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare

3.35 Scoping agreed. In respect of determining effects on neighbours from overshadowing it is confirmed that both VSV and NSL are to be used. It is noted that the Report acknowledged that ADF is not an appropriate measure unless full details of interior of rooms is known.

3.36 In respect of daylight impacts, the alternative target of 15% VSC suggested at paragraph 9.12 of the Report is not agreed given the nature of the Site, which adjoins suburban housing. An alternative target VSC value of 20% is recommended.

3.37 Wind Microclimate



3.38 Scoping agreed.

3.39 **Cumulative Effects and Consultation**

3.40 Some additional schemes should be considered as listed below. Additionally, it is assumed that in Table 13 (Cumulative schemes), 'Osterley Park' is a reference to the existing Tesco superstore site. Reference should also be made to the following developments:

3.41 **Former Syon Gate Service Station, Land at South of Gillette Corner, Great West Road, Isleworth TW7 5NP**

00505/AF/P28 - Erection of up to six storey building to provide Class B1 (office) and Class B8 (self-storage) uses, with associated car parking and landscaping – Approved at Planning Committee 2 May 2019 (section 106 to be completed)

3.42 **891 Great West Road, Isleworth London TW7 5PD**

00505/891/P4 - Demolition of existing buildings and erection of a four-storey building to provide 15 self-contained flats, provision of private and shared amenity space, cycle parking, hard and soft landscaping and associated development – Allowed on appeal 4 April 2019

00505/891/P5 - Part refurbishment, part demolition of existing buildings and erection of a five-storey (plus basement) mixed-use building for online retail fulfilment and wholesale purposes including storage and distribution (Class B8), offices (Class B1(a)) and ancillary retail, gallery/display and photographic studio uses, provision of car and cycle parking, hard and soft landscaping and associated development - Refused (Planning Committee) 3 August 2018 – Awaiting appeal decision (APP/F5540/W/19/3220449)

3.43 **New Horizons Court, Ryan Drive, Brentford, TW8 9EP**

02912/A/P1 – Prior Approval for change of use from office (Class B1) to 268 residential units (Class C3) – Allowed on appeal 4 July 2017

02912/A/P2 – Change of use from office (Class B1(a)) to residential (Class C3) to provide 297 residential flats – Allowed on appeal 4 July 2017

02912/A1/P1 - Alterations to the existing building to provide 6 residential apartments with associated parking

02912/A2/P2 - Conversion of third floor to create eight self-contained flats

02912/A3/P2 - Conversion of third floor to create seven self-contained flats

02912/A4/P2 - Conversion of third floor to create six flats

02912/A4/P3 - Conversion of part of the ground floor to create four self contained flats



Approved at Planning Committee 6 September 2019 (section 106 to be completed)

02912/A4/PA2 - Prior approval for change of use of a building from office use (Class B1(a)) to provide 45 flats (Class C3) – Approved 18 December 2018

02912/A2/PA1 - Prior approval for change of use of a building from office use (Class B1(a)) to provide 65 flats (Class C3) – Approved 18 December 2018

02912/A3/PA1 - Prior approval for change of use of a building from office use (Class B1(a)) to provide 62 flats (Class C3) – Approved 15 December 2018

3.44 Sky, Sites 6 & 7, Grant Way, Isleworth TW7 5QD

00558/A/P69 - Reserved matters (layout, scale, access, landscaping and appearance for Parcel F) application for the erection of two buildings comprising a single storey pavilion and a ground plus three storey building office and ancillary food and beverage with associated landscaping, servicing, plant and all ancillary enabling works within Parcel F following approval of an outline application ref 00558/A/P64 dated 18/08/2015 – Decision Pending.

3.45 Consultation

3.46 It is recommended that additional consultation should be undertaken with Heathrow Airport (natssafeguarding@nats.co.uk) and Network Rail (Assets Protection and Optimisation)

3.47 Public Consultation should be carried out with this to be detailed within a Statement of Community Involvement. In addition to consulting neighbouring residents and businesses, this consultation should also include the Osterley and Wyke Green Residents Association, Brentford Community Council, and Ward Councillors (Osterley and Spring Grove, Isleworth and Syon).

3.48 Environmental Topics to be Scoped Out

3.49 The Report lists various topics for which significant environmental effects are not considered likely and as a result are to be scoped out of the ES. These topics are considered in the following sections.

3.50 Biodiversity

3.51 Scoping out agreed. Supporting documents should demonstrate compliance with the proposed Urban Greening Factor requirements of the draft London Plan (policy G5)

3.52 Archaeology

3.53 Scoping out agreed with issues to be considered in supporting planning documents. Comments from Historic England are attached.



3.54 Land Contamination

3.55 Scoping out agreed with issues to be considered in supporting planning documents. Comments from the LPA's Land Quality Officer are attached.

3.56 Water Resources and Flood Risk

3.57 Scoping out agreed with issues to be considered in supporting planning documents. A Flood Risk Assessment is required along with a drainage strategy. Comments from the LPA's Flood Risk and Drainage advisor, Thames Water are attached.

3.58 Climate Change and Greenhouse Gases

3.59 Scoping out agreed with issues to be considered in supporting planning documents including an Energy Statement and Sustainability Statement.

3.60 Lighting

3.61 Scoping out agreed with issues to be considered in supporting planning documents. Supporting evidence should address effects from any proposed advertisements.

3.62 Waste

3.63 Scoping out agreed with issues to be considered in supporting planning documents.

3.64 Accident and Disasters

3.65 Scoping out agreed with issues to be considered in supporting planning documents.

4.0 Conclusions

4.1 The scope of the EIA that has been outlined is generally considered acceptable subject to the above points being noted and included within any subsequent ES and accompanying planning application and its supporting documents. The Transport impacts of the proposal in particular will require extensive analysis including addressing TfL guidance.

4.2 A Non-Technical Summary of the EIA should accompany the Environmental Statement and a summary of the proposal accompanying the planning application would benefit public engagement.

4.3 The EIA documentation incorporating this formal Scoping Opinion and responses on scoping issues from statutory and non statutory consultees to demonstrate that key issues have been addressed should be available for inspection and purchase at a reasonable cost by the public at convenient locations. The provision of the ES on CD ROM 'PDF' and 'word' format would also be beneficial for consultation and



for public information.

- 4.4 For any additional information regarding this Scoping Opinion please contact Shane Baker at shane.baker@hounslow.gov.uk or 020 8583 4899.

Scoping Opinion
Prepared by:

Scoping Opinion
Audited by:

Shane Baker

Deputy Head of Opportunities
Areas and Growth

Date: September 2019

Sarah Scannell

Assistant Director Planning and Development

Date: September 2019

On behalf of the Strategic Director Housing, Planning and Communities, London Borough of Hounslow.



APPENDIX 1

DRAFT

Date: 09 August 2019
Our ref: 290486
Your ref: 00505/H/SCOPE1



London Borough of Hounslow

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Cheshire
C W1 6GJ

BY EMAIL ONLY

planningcomments@hounslow.gov.uk

T 0300 060 3900

Dear Sir or Madam,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town & Country Planning EIA Regulations 2017): Scoping opinion for the demolition of the existing Homebase store on the site and the construction of a new residential led mixed use development comprising up to 450 residential units, and up to 8,500 square metres (sqm) gross internal area (GIA) of commercial floorspace which will comprise a Tesco Extra store and some additional flexible commercial use. The proposed development's Tesco Extra store will be located at ground floor level, with the customer car parking split across two parking levels above the store. Residential parking will also be provided above the Tesco Extra store. The maximum height of the proposed development would be up to 71 metres (16 storeys) Above Ordnance Datum (mAOD), in the southwestern part of the site.

Location: HOMEBASE SYON LANE ISLEWORTH TW7 5QE

Thank you for your consultation dated and received by Natural England on 25 July 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at consultations@naturalengland.org.uk, and we may be able to provide further information.

Yours faithfully

Beth Seale
Consultations Team

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

1. A description of the development, including in particular:

- (a) a description of the location of the development;
- (b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
- (c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
- (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.

2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

5. A description of the likely significant effects of the development on the environment resulting from, inter alia:

- (a) the construction and existence of the development, including, where relevant, demolition works;
- (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
- (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
- (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
- (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
- (f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
- (g) the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC (a) and Directive 2009/147/EC(b).

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.

8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

2. **Biodiversity and Geology**

2.1. Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. [Guidelines for Ecological Impact Assessment \(EclA\)](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework ([NPPF](#)) sets out guidance in paragraphs 170-171 and 174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2. Internationally and Nationally Designated Sites

Natural England undertakes an initial assessment of all development consultations, by determining whether the location to which they relate falls within geographical 'buffer' areas within which development is likely to affect designated sites. The proposal is located outside these buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers for designated sites. The ES should therefore thoroughly assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement

Local Planning Authorities, as competent authorities under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), should have regard to the Habitats Regulations Assessment process set out in Regulation 63 of the Habitats Regulations in their determination of a planning application. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Statutory site locations can be found at www.magic.gov.uk. Further information concerning particular statutory sites can be found on the [Natural England website](#).

2.3. Protected Species

The ES should assess the impact of all phases of the proposal on protected species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

Natural England has adopted [standing advice](#) for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It also includes links to guidance on survey and mitigation.

Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species.

2.4. Regionally and Locally Important Sites

The ES should thoroughly assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS). Natural England does not hold comprehensive information on these sites. We therefore advise that the appropriate local biological record centres, nature conservation organisations, Local Planning Authority and local RIGS group should be contacted with respect to this matter.

2.5. Biodiversity Action Plan Habitats and Species

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, recently [published](#) under the requirements of S14 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication '[Guidance for Local Authorities on Implementing the Biodiversity Duty](#)'.

Government Circular 06/2005 states that BAP species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of BAP habitat for the area under consideration.

3. Landscape, Access and Recreation

3.1. Landscape and Visual Impacts

The consideration of landscape impacts should reflect the approach set out in the *Guidelines for Landscape and Visual Impact Assessment* (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the *Landscape Character Assessment Guidance for England and Scotland* (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England would expect

the cumulative impact assessment to include those proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

3.2. Access and Recreation

The ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. With this in mind and in addition to consideration of public rights of way, the landscape and visual effects on Open Access land, whether direct or indirect, should be included in the ES.

Natural England would also expect to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation. We also recommend reference to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

4. Land use and soils

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 and 171 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource, also in line with paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) *'The Natural Choice: securing the value of nature'* (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils and the protection of BMV agricultural land.

Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around the development as result of construction activities. This affects their functionality as wildlife habitat, and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution.

Defra published a Construction [Code of Practice for the sustainable use of soils on construction sites](#) (2009). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

As identified in the NPPF new sites or extensions to new sites for Peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra [Guidance for successful reclamation of mineral and waste sites](#).

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which

may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment "by establishing coherent ecological networks that are more resilient to current and future pressures" ([NPPF](#) Paras 170 and 174), which should be demonstrated through the ES.

SC/2019/2802

Homebase, Syon Lane, Isleworth, TW7 5QE

Air Quality and Noise Consultation Response

16th August 2019

Person for contact: Surinderpal Suri

Author: Nigel Mann, WYG

Development Description

Scoping opinion for the demolition of the existing Homebase store on the site and the construction of a new residential led mixed use development comprising up to 450 residential units, and up to 8,500 square metres (sqm) gross internal area (GIA) of commercial floorspace which will comprise a Tesco Extra store and some additional flexible commercial use. The proposed developments Tesco Extra store will be located at ground floor level, with the customer car parking split across two parking levels above the store. Residential parking will also be provided above the Tesco Extra store. The maximum height of the proposed development would be up to 71 metres (16 storeys) Above Ordnance Datum (mAOD), in the southwestern part of the site.

Comments on Application Documents

The submitted documents have been reviewed and have the following comments on the application. Following a review of the applicant's Environmental Impact Scoping Report document we have the following comments and recommendations.

Air Quality

8.4 The proposed methodology is generally in-line with standard industry practice including consideration of on and off-site effects relating the construction and operational phases of the development. The following must also be included within the assessment;

- Inclusion of the Tesco Superstore Development (01106/B/SCOPE1) to the north of the proposed site within the cumulative assessment;
- Identify receptors to be included within the assessment, both construction and operational phase.
- When assessing impacts on sensitive receptors and considering approach to mitigation, use significance criteria specified in 'London Councils Air Quality and Planning Guidance', in conjunction with IAQM to assess change in vehicle fleet etc
- Ensure the latest available monitoring data is utilised within model verification (ideally including the monitoring proposed to be undertaken for the 01106/B/SCOPE1 application) ;

- Ensure verification is undertaken in accordance with guidance in Section 7 LAQM Technical Guidance TG(16)
- Ensure consultation with the LBH is undertaken to determine model verification, latest monitoring and to confirm modelling methodology.
- When considering ventilation, passive or otherwise, consideration should also be given to overheating.

Noise

The proposed methodology is generally in-line with standard industry practice including consideration of on and off-site effects relating the construction and operational phases of the development.

It is noted that noise emissions from any fixed plant and servicing areas with the proposed development will be assessed. This should include both noise from fixed plant related to the development as well as the unloading / loading of goods including the movement of HGV vehicles associated with the proposed commercial space. The assessment should include the effects on both existing and proposed residential receptors.

An assessment should also be undertaken which considers the noise transfer from the internal spaces of the proposed ground floor to the upper residential areas.

It is noted that redevelopment of the nearby Tesco Superstore Development (01106/B/SCOPE1) to the north of the proposed site should be included as part of the cumulative effects of the scheme. It is therefore expected that the construction and operational noise assessments will consider these effects accordingly.

When considering suitability of site for the proposed development (NPPF), consideration should be had for layout in regards to noise sensitive uses, plausibility of mitigation measures against multiple noise sources (road, rail & aircraft), including noise from plant (ventilation), giving due consideration to overheating under the new guidelines TM59.

Shane Baker

From: Lauren Nevin
Sent: 30 July 2019 14:14
To: planning comments
Cc: Ann Nye-Bennett
Subject: FW: Internal Stat Consultation - App ref SC/2019/2727
Attachments: E_922105239.DOC; Flood risk and drainage document checklist.pdf; LBH Drainage Assessment template v4.pdf

Categories: eliz

Hi Planning / Ann,

Could you please arrange for this to be forwarded on to the appropriate case officer in relation to the Scoping application at Homebase, Syon Lane, Isleworth.

The LLFA have reviewed the information submitted for the proposed development at ' Homebase, Syon Lane, Isleworth, SC/2019/2727 '.

In response to the document provided an FRA will need to be provided at full application stage along with a drainage strategy.

If you could please also fill out the LBH Drainage Assessment template provided and include all of the documents listed in the flood risk and drainage document checklist which I have attached to this email.

Kind regards,

Lauren Nevin | Flood Risk Management Consultant

Email : Lauren.Nevin@hounslow.gov.uk

Please note that I am typically only in the Hounslow Council office on Tuesdays and have limited remote access to my emails.

If you would like to arrange a call discuss a query further please request this via email stating your availability

Regeneration, Economic Development & Environment Department [REDe]

London Borough of Hounslow, Lampton Road, Hounslow, TW3 4DN

From: Amna Javaid <Amna.Javaid@hounslow.gov.uk>
Sent: Thursday, July 25, 2019 4:44 PM
To: Tom Whitworth <Tom.Whitworth@hounslow.gov.uk>
Subject: Internal Stat Consultation - App ref SC/2019/2727

Please find attached document



Planning Application document checklist for flood risk and drainage policy requirements

The checklist should be completed by all applicants who are submitting a full planning application. This document should be provided with their application or as soon as possible after.

A decision on an application cannot be given until the listed documents have been provided to a satisfactory standard in line with Hounslow’s policy.

If the applicant is unsure as what standard is required. Please contact the Lead Local Flood Authority (LLFA) for more information:

Email: flooding@hounslow.gov.uk

FAO: Lauren Nevin (Primary contact)

Tom Whitworth (Secondary contact)

CHECKLIST TO BE COMPLETED AND RETURNED BY THE APPLICANT VIA THE ABOVE EMAIL

Evidence Documents	Application stage		Provided to the LLFA (Y/N)
	Full (Outline Design stage)	Discharge of Condition (Detailed Design stage)	
Hounslow’s Drainage Assessment Form	✓	<i>The evidence documents listed will only need to be re-submitted at condition stage if anything has changed or not been submitted to a satisfactory standard as part of the full application</i>	
Drainage layout drawings	✓		
Infiltration feasibility assessment	✓		
Evidence that all levels of the drainage hierarchy have been considered and justified	✓		
Greenfield runoff rate drainage calculations	✓		
Pre-development runoff rate drainage calculations	✓		
Post-development runoff rate drainage calculations with mitigation proposed	✓		
Design storage volume calculations	✓		
Drainage design calculations demonstrating the scheme meets policy	✓		
Most up to date and appropriate climate change allowance incorporated in the design	✓		
Maintenance and adoption plan	✓		
Consultation with Thames Water if connecting to the sewer network	✓		
Consultation with the Environment Agency if in Flood Zone 2 or 3	✓		



Below is a list of the relevant policies the application needs to align with as discussed within the Drainage Assessment Form:

National

National Planning Policy Framework & National Planning Policy Guidance

The Non-Statutory Technical Guidance for SuDS

Designing for Exceedance in urban drainage

Regional

London Plan Policy 5.13

London Plan Sustainable Design and Construction Supplementary Planning Guidance, section 3

Local

Hounslow Strategic Flood Risk Assessment

Hounslow Local Flood Risk Management Strategy

Hounslow Local Plan

Important condition stage information (Please read):

Please note that Hounslow's LLFA will seek an acceptable level of information prior to the determination of the applicant. If for any reason any information is outstanding, pre-commencement condition will be required.

This is likely to cover the following wording:

Prior to commencement of works (excluding site investigations and demolition), the applicant must submit for review and approval by the Local Planning Authority, final detailed drainage designs (including drawings) of the proposed scheme agreed at full application stage.

This must include(List outstanding issues if required).....

If you have concerns with the above condition process please contact the LLFA to discuss further as soon as possible.

Note: A prior to occupation condition may also apply to the development. This will be a request for evidence to demonstrate that the drainage strategy has been implemented in line with approved application. Any questions or guidance on this please contact the LLFA.

Shane Baker

From: Landquality
Sent: 16 August 2019 14:52
To: planning comments
Subject: FW: Internal Stat Consultation - App ref SC/2019/2727
Attachments: E_922105238.DOC

Categories: GEETA

Please forward it to planning officer when the case is allocated.

We have reviewed this *Environmental Impact Assessment Scoping Report* for the proposed redevelopment at Homebase Syon Lane. Due to its former industrial uses, as well as its current use, we would suggest a **J12 condition** for proposed residential / commercial development.

This scoping report explains that a Geo-Environmental Assessment Report has been prepared for this site, and will be submitted to LBH. We will review this assessment report when it is available, and consider whether some of the requirements under J12 could be discharged.

Kind regards

Ann Zhang | Regulatory Officer – Land Quality

Hounslow House, 7 Bath Road, Hounslow, TW3 3EB

Office: 020 8583 6794

Work mobile: 07980 7686 38

Ann.Zhang@hounslow.gov.uk

-----Original Message-----

From: Amna Javaid

Sent: 25 July 2019 16:45

To: Landquality <Landquality@hounslow.gov.uk>

Subject: Internal Stat Consultation - App ref SC/2019/2727

Please find attached document



Drainage Assessment Form

We require applicants to complete this Drainage Assessment Form (DAF) and submit it to the Local Planning Authority, referencing from where the information in the submission document is taken. The form is supported by the [Defra/EA guidance on Rainfall Runoff Management](http://www.evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/Rainfall_Runoff_Management_for_Developments_-_Revision_E.sflb.ashx) document (www.evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/Rainfall_Runoff_Management_for_Developments_-_Revision_E.sflb.ashx) and aligns to the tools on www.UKsuds.com.

1. Site details

SITE DETAILS		NOTES FOR APPLICANTS & LOCAL AUTHORITIES
Site Name		
LPA reference (if applicable)		
Address & postcode		
Grid reference		Centre point of the site in eastings, northings (XXXXXX, YYYYYY) format.
Brief description of proposed work		For example, type of development, number of units etc.
Is the existing site Brownfield or Greenfield?		Brownfield = developed. Greenfield = undeveloped.
Total site area (Ha)		The area, in hectares, of the whole development site including any large parkland areas and public open space.
Significant public open space (Ha)		The area, in hectares, of any large parkland areas or public open space situated within the site which remains largely unchanged and is not provided with positive drainage
Area positively drained (Ha)*		This is the total development area that is served by the drainage system. It is the difference between the total site area and the significant public open space.



Is the site currently known to be at risk of flooding from any sources? If so, please state and provide evidence.		Please attach surface water and fluvial flood risk maps (as shown on the Environment Agency's website) and any records of known historic flooding at the site.
--	--	---

* The Greenfield runoff rate from the development which is to be used for assessing the requirements for limiting discharge flow rates and attenuation storage from a site should be calculated for the area that forms the drainage network for the site whatever size of site and type of drainage technique. Please refer to the Rainfall Runoff Management document or CIRIA SuDS Manual for details.

2. Impermeable area

	EXISTING	PROPOSED	DIFFERENCE (PROPOSED-EXISTING)	NOTES FOR APPLICANTS & LOCAL AUTHORITIES
Impermeable area (Ha) Surfaces which do not permit infiltration of water into the ground.				If proposed > existing, then runoff rates and volumes will be increasing.
Drainage Method Rainwater harvesting/infiltration/SuDS/ watercourse/sewer				See the London Plan Policy 5.13 Drainage Hierarchy . If the existing drainage was via infiltration and the proposed is not, section 3 should provide evidence as to why.

3. Is infiltration on-site suitable? Storage is required for the additional volume from site but also for holding back water to slow down the rate of discharge from the site. This is known as attenuation storage and long term storage. The idea is that the additional volume is not permitted to flow rapidly overland, into watercourses or into the sewer system and hence potentially increase flood risk on site and/or downstream of the site. You can either infiltrate the stored water back into the ground or if this is not possible, hold it back with on-site storage, allowing gradual discharge at a controlled rate. Please fill in the table to show the extent of your investigations as to whether infiltration is a possible route for runoff to be discharged to.

			NOTES FOR APPLICANTS & LOCAL AUTHORITIES
Infiltration	State the site's geology (including superficial deposits where known)		Infiltration rates are highly variable and infiltrating into made (i.e. unnatural) ground should be avoided.
	State the site's known Source Protection Zones (SPZ)		Please refer to the Environment Agency website to identify any source protection zones (SPZ).
	What is the development site's infiltration rate?		Infiltration rates should be worked out in accordance with BRE 365. If infiltration is the preferred method of drainage, then rates should be no lower than 1×10^{-6} m/s.
	Were infiltration rates obtained via a desktop study or from infiltration tests?		If it is not feasible to access the site to carry out infiltration tests before the application is submitted, a desktop study could be undertaken looking at the underlying geology of the area and assuming a worst-case infiltration rate. If a desktop study demonstrated that infiltration could be feasible then a ground



			investigation will need to be completed to evidence that infiltration can be used as part of the scheme without increasing risk.
	At what depth below ground is the water table (groundwater level)?		Where known, please use borehole test results and state the time of year these were carried out. If high groundwater levels are considered to be an issue, then borehole testing should be completed as part of a ground investigation.
	State the distance between the proposed infiltration device base and the water table		If the ground conditions are found to be suitable from a desktop survey or ground investigation, a minimum of 1m depth between the base of the infiltration device and the water table is required to protect groundwater quality and ensure groundwater does not enter infiltration devices. Avoid infiltration where this is not possible.
	Is the site contaminated? If yes, consider advice from others on whether infiltration is a safe solution.		A ground investigation will need to consider potential contamination to groundwater. Water should not be infiltrated through land that is contaminated. The Environment Agency may provide bespoke advice in planning consultations for contaminated sites that should be considered.
In light of the above information, is infiltration feasible?		Yes / No	If infiltration is not feasible the applicant should consider the options in section 4. If infiltration is feasible, then it can be combined with the methods in section 4.

4. Method proposed for discharge of surface water (in line with the [London Plan Policy 5.13](#)). Please select multiple options where necessary. Where an option is not deemed possible, sufficient justification must be submitted with supporting evidence where necessary.

	YES	NO	EVIDENCE THAT THIS IS OR IS NOT POSSIBLE	NOTES FOR APPLICANTS & LOCAL AUTHORITIES
Rainwater harvesting				Rainwater harvesting is where rainwater is stored on site for reuse. For example, water for gardening, domestic use etc. Harvesting features could include, but are not limited to, rainwater harvesting tanks and water butts.
Infiltration				Allowing space for rainwater to soak into the ground, as per natural methods. If proposed, these must satisfy the requirements shown in section 3 of this DAF.
Attenuation of rain water in ponds and open water features				Please see the CIRIA SuDS Manual (C753) for further details about above ground attenuation techniques. Examples could include, but are not limited to, swales, detention basins, rain gardens, planters, etc



Attenuation of rain water through tanks or sealed water features				Underground storage features which gradually release water. Please note that these are less sustainable than above ground methods and are usually more complex to maintain.
To watercourse				Is there a watercourse nearby? If so please name, stating approximate distance from site. Evidence of discharge agreement with the Environment Agency (for 'main rivers') or the Lead Local Flood Authority (for 'ordinary watercourses', i.e. all non-'main rivers') will be required.
To surface water sewer				The confirmation from sewer provider that sufficient capacity exists for this connection will be required.
To combined sewer				This would only be acceptable where other options are not reasonably practical and will not be accepted where separate sewer systems currently exist on or close to the site.

5. Supporting calculations – in order to check that the proposed development is designed to conform to standards, please complete the following three tables and submit your supporting calculations.

A. Peak discharge rates – this is the maximum flow rate at which storm water runoff leaves the site during a particular storm event.

Please circle which method was used to calculate the Greenfield Runoff Estimation:			IH124 method / FEH method / Other (please state)	
<i>London Plan policy 5.13: Developers should aim for a Greenfield runoff rate from their developments.</i>				
<i>London Plan Sustainable Design and Construction SPG section 3.4.10: All developments on Greenfield sites must maintain Greenfield runoff rates. On previously developed sites, runoff rates should not be more than three times the calculated Greenfield rate.</i>				
	GREENFIELD RATES (L/s)	EXISTING RATES (IF PREVIOUSLY DEVELOPED) (L/s)	PROPOSED RATES (L/s)	NOTES FOR APPLICANTS & LOCAL AUTHORITIES
QBAR				QBAR is approximately the 1 in 2 year storm event.



1 in 1 year				Proposed discharge rates (with mitigation) should be no greater than the Greenfield rates for all corresponding storm events. If restrictions to Greenfield rates cannot be achieved then sufficient justification (with supporting evidence) must be submitted. Please note that discharging all flow, regardless of the corresponding storm event intensity, from site at the existing 1 in 100 year event rate would increase flood risk during smaller events and therefore would not be permitted. Applicants must also check and adhere to existing Local planning policy where further runoff restrictions may apply.
1 in 30 year				
1 in 100 year				
1 in 100 year plus climate change (CC)				To mitigate for climate change, the proposed 1 in 100 year +CC runoff rate must be no greater than the Greenfield 1 in 100 year event runoff rate. The peak rainfall intensity allowance used must be in line with the latest Environment Agency's climate change allowance guidance. Currently this requires allowances of 20% and 40% to be added, and the most appropriate one used and justified. Typically for heavily urban sites we would ask for 40% to be used.

B. Discharge volumes post development

The Non-Statutory Technical Guidance for SuDS: Where reasonably practicable, for Greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the Greenfield runoff volume for the same event. Where reasonably practicable, for developments which have been previously developed, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event must be constrained to a value as close as is reasonably practicable to the Greenfield runoff volume for the same event, but should never exceed the runoff volume from the development site prior to redevelopment for that event.

	STORAGE VOLUME REQUIRED TO ACHIEVE THE GREENFIELD RUNOFF RATE (M ³)	PROPOSED STORAGE VOLUME ON SITE POST-DEVELOPMENT (M ³)	IF THE PROPOSED STORAGE VOLUME ON SITE POST-DEVELOPMENT IS LESS THAN THE STORAGE VOLUME REQUIRED TO ACHIEVE THE GREENFIELD RUNOFF RATE, PLEASE PROVIDE A JUSTIFICATION AS TO WHY. APPLICANTS MUST ALSO CHECK AND ADHERE TO EXISTING LOCAL PLANNING POLICY WHERE FURTHER RUNOFF RESTRICTIONS MAY APPLY.
1 in 100 year, 6 hour event			



C. Storage methods – Attenuation storage is provided to enable the rate of runoff from the site into the receiving watercourse or sewer to be limited to an acceptable rate to protect against erosion and flooding downstream. The volume needing storage is a function of the amount of development relative to the Greenfield discharge rate.

TYPE OF SUDS FEATURE	VOLUME (M ³)	NOTES FOR APPLICANTS & LOCAL AUTHORITIES
1		SuDS can be adapted for most situations even where infiltration isn't feasible e.g. impermeable liners beneath some SuDS devices allows treatment but not infiltration. See the CIRIA SuDS Manual (C753) . If no storage features have been proposed please explain why this is the case and provide evidence to support this reasoning in the box below.
2		
3		
4		
5		
6		
7		
8		
9		
10		
TOTAL		This value should be equal to or greater than the 'Proposed storage volume' value in section 5B.



IF NO STORAGE FEATURES HAVE BEEN PROPOSED IN THE SECTION ABOVE, PLEASE EXPLAIN WHY THIS IS THE CASE AND PROVIDE EVIDENCE TO BACK UP THIS REASONING IN THIS BOX:
(EVIDENCE MUST BE SUFFICIENTLY DETAILED TO DEMONSTRATE THAT A SUDS BASED SYSTEM IS IMPRACTICAL FOR THIS SITE)

6. Please confirm...

	EVIDENCE (PLEASE NAME RELEVANT EVIDENCE DOCUMENT(S))	NOTES FOR APPLICANTS & LOCAL AUTHORITIES
That the drainage system can contain the 1 in 30 storm event without flooding.		The Non-Statutory Technical Standards for SuDS states that no part of the site should flood during a 1 in 30 year event (unless that area is designated to hold and/or convey water as part of the design). This is also a requirement for Sewers for Adoption and is good practice.
That any flooding between the 1 in 30 & 1 in 100 plus climate change storm events will be safely contained on site.		Safely: not causing property flooding or posing a hazard to site users i.e. no deeper than 300mm on roads/footpaths. Flood waters must drain away at section 5A rates.
How runoff flows from storm events in excess of 1 in 100 years will be managed on site.		As per the Non-Statutory Technical Standards for SuDS, proposed methods for managing excess flows should be demonstrated so as to minimise the risks to people and property, e.g. through evidence of exceedance routes. These exceedance proposals should be for runoff in storm events greater than 1 in 100 year plus climate change.



<p>How are rates being restricted (hydrobrake etc.)?</p>		<p>Recent development in some flow control devices now allow flow rates to be controlled as low as 0.7l/s without pipe blockages (see Hydrobrake)</p>
--	--	---

7. Adoption and maintenance – please provide the following information (*Note: This space should only be used to reference a standalone document that covers details of both maintenance and adoption of the scheme*)

	ADOPTION AND MAINTENANCE INFORMATION	NOTES FOR APPLICANTS & LOCAL AUTHORITIES
<p>Please confirm the proposed owners/adopters of the entire drainage systems throughout the life of the development. Please list all the owners and contact details.</p>		<p>If there are multiple owners, a drawing illustrating exactly which features will be within each owner’s remit must be submitted with this DAF.</p>
<p>How is the entire drainage system to be maintained?</p>		<p>Clear details of the maintenance proposals of all elements of the proposed drainage system over the lifetime of the development must be provided. Poorly maintained drainage can lead to increased flooding problems in the future.</p> <p>Please note that a maintenance plan should be provided as a standalone document, so that it can then be implemented easily by whoever adopts the drainage scheme going forward.</p>



8. Evidence. Please identify where the details quoted in the sections above have been taken from i.e. supporting plans, calculations, reports etc. Please also provide relevant drawings that need to accompany your submitted DAF, in particular exceedance routes and ownership and location of SuDS (maintenance access strips etc.).

FORM SECTION	DOCUMENT REFERENCE WHERE DETAILS STATED ABOVE ARE TAKEN FROM	PAGE NUMBER(S)
Section 2		
Section 3		
Section 4		
Section 5A		
Section 5B		
Section 5C		
Section 6		
Section 7		

This DAF should be completed using evidence from the documents submitted with this application. This should include site plans and, if necessary for the site, a Flood Risk Assessment (FRA) (see the Local Planning Authority’s Strategic Flood Risk Assessment for details of when a FRA is required). The DAF serves as a summary sheet of the drainage proposals and should clearly show that the proposed runoff rate and volume as a result of development will not be increased. If, without the use of SuDS, there would be an increase in runoff rate and/or volume, the rate and volume sections should be completed to set out how the additional rate/volume will be managed.

Form completed by:

Qualification of person responsible for signing off this Drainage Assessment Form:

Company:

On behalf of (Client’s details):

Date:

Shane Baker

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 07 August 2019 09:47
To: Shane Baker; Amna Javaid
Cc: NATS Safeguarding; safeguarding@heathrow.com
Subject: RE: External Stat Consultation - App ref SC/2019/2727 (SG28437)

Dear Shane and Amna

NATS has assessed the outline proposal and while the risk of an impact on its H10 radar exists, it considers this to be low. However, NATS would encourage the Applicant to engage early on with NATS Safeguarding in respect of any further details which may become available such as the final design and exterior finish of the building as the scale and detailed orientation/exterior material can have a bearing on any radar impact.

NATS would encourage the Applicant to provide these further details, or alternatively consider undertaking a Pre-planning assessment, details of which can be found at the following address:

<https://www.nats.aero/services/information/preplanning-assessment-buildings-structures/>

Regards



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

From: Shane Baker <Shane.Baker@hounslow.gov.uk>
Sent: 29 July 2019 15:13
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>; Amna Javaid <Amna.Javaid@hounslow.gov.uk>
Subject: RE: External Stat Consultation - App ref SC/2019/2727

The data you require is below, regards

The Grid Ref for the site is: TQ164773

X (Easting)
516426

Y (Northing)
177329

-----Original Message-----

From: NATS Safeguarding [<mailto:NATSSafeguarding@nats.co.uk>]
Sent: 26 July 2019 09:25
To: Amna Javaid <Amna.Javaid@hounslow.gov.uk>
Cc: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: RE: External Stat Consultation - App ref SC/2019/2727

Shane Baker
Hounslow House 7 Bath Road
Hounslow
TW3 3EB

Our ref: NE/2019/130567/01-L01
Your ref: 00505/H/SCOPE1
Date: 8 August 2019

Dear Shane,

Scoping opinion for the demolition of the existing Homebase store on the site and the construction of a new residential led mixed use development comprising up to 450 residential units, and up to 8,500 square metres (sqm) gross internal area (GIA) of commercial floorspace which will comprise a Tesco Extra store and some additional flexible commercial use. The proposed developments Tesco Extra store will be located at ground floor level, with the customer car parking split across two parking levels above the store. Residential parking will also be provided above the Tesco Extra store. The maximum height of the proposed development would be up to 71 metres (16 storeys) above ordnance datum (mAOD), in the southwestern part of the site.

Homebase, Syon Lane, Isleworth, TW7 5QE

Thank you for consulting us on the above planning application. The Environment Agency is a statutory consultee for all proposals that include an Environmental Impact Assessment.

Environment Agency Position

Based on a review on the submitted Environmental Impact Assessment (EIA), reference Homebase, Syon Lane, Brentford Environmental Impact Assessment Scoping Report, prepared by Barton Willmore (dated July 2019), there are no environmental constraints that fall within our remit at this site and we would therefore have **no comments** to make on this scoping opinion.

If you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

Mr Jeffrey Oyinlola
Planning Advisor

Direct dial: 02077141629

Direct e-mail: HNL SustainablePlaces@environment-agency.gov.uk

End

Shane Baker

From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 08 August 2019 13:11
To: Amna Javaid; Planning Objections
Subject: RE: External Stat Consultation - App ref SC/2019/2727

Categories: GEETA

Site: HOMEBASE SYON LANE ISLEWORTH TW7 5QE

Proposal: Scoping opinion for the demolition of the existing Homebase store on the site and the construction of a new residential led mixed use development comprising up to 450 residential units, and up to 8,500 square metres (sqm) gross internal area (GIA) of commercial floorspace which will comprise a Tesco Extra store and some additional flexible commercial use. The proposed development's Tesco Extra store will be located at ground floor level, with the customer car parking split across two parking levels above the store. Residential parking will also be provided above the Tesco Extra store. The maximum height of the proposed development would be up to 71 metres (16 storeys) Above Ordnance Datum (mAOD), in the southwestern part of the site.

Thank you for your consultation.

I can confirm that London Underground Infrastructure Protection has no comment to make on this planning application.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

However, there are Network Rail assets close to this site. Please contact them directly to query what affect if any your proposals will have on the railway.

Shahina Inayathusein
Safeguarding Engineer (LU+DLR)
TfL Engineering
Email: locationenquiries@tube.tfl.gov.uk Find out more about Infrastructure Protection - <https://youtu.be/OhGoJMTBOEg>

-----Original Message-----

From: Amna Javaid [<mailto:Amna.Javaid@hounslow.gov.uk>]
Sent: 25 July 2019 16:45
To: Location Enquiries
Subject: External Stat Consultation - App ref SC/2019/2727

Please find attached document

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Shane Baker

From: BCTAdmin@thameswater.co.uk
Sent: 05 August 2019 15:42
To: planning comments
Subject: 3rd Party Planning Application - SC/2019/2727 - SCOPING OPINION

Categories: GEETA

London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow
Middlesex
TW3 4DN

Our DTS Ref: 59844
Your Ref: SC/2019/2727 - SCOPING OPINION

5 August 2019

Dear Sir/Madam

Re: 67, Syon Lane, Isleworth, Middlesex, TW7 5QE

Waste Comments

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Water Comments

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
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Rickmansworth,
WD3 9SQ

Tel:020 3577 9998

Email: devcon.team@thameswater.co.uk

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