

APPENDIX 2.4
LBH EIA SCOPING OPINION



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 (75m AOD) providing up to 500 residential units, up to 10,700 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 received 25 July 2019 and the additional note dated 20 September 2019 (“**the Report**”). It is noted that subsequent to the submission of the initial Report in July 2019, the description of the proposal was revised, with the scheme to include up to around 500 dwellings, an increase from the original proposal of around 450 dwellings and 10,700 sqm of commercial space up from 8,500 sqm. The change in the number of proposed dwellings and commercial space 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 76m AOD (16-storeys), providing around 500 dwellings, up to 10,700 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 (“HIA”). The additional note of September 2019 confirms that a HIA is to be submitted with the planning application and included as an appendix to the Population and Human Health chapter.

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/0autr85isskhfkiq3rnmsgwuhya5fs9e>). Comments from Historic England are given in the appendix.

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 for Visual Representations of Development Proposals – TGN 06/91. 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 had been identified as needing to be reviewed to determine if further assessment is needed as listed below. Further assessment has been undertaken which confirms the proposed development would not be visible from this location. Details of the assessment that demonstrates no further work is necessary should be included within the EIA.

- 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"). Rather than referring to the 2007 Department of Transport TA guidance set out in paragraph 6.5 of the Report, the TA must be produced in line with the latest TfL Transport Assessment Best Practice Guidance available here:

<https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>.

- 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 EIA and TA must take into account the Mayor's Transport Strategy and the new Draft London Plan and should in particular reflect policy approaches such as the "Healthy Streets, planning for Good Growth" and the Mayoral Mode share targets, as well as Vision Zero agenda. As such, the development needs to be designed in order to achieve mode shift in favour of walking, cycling and public transport.

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 Micro- simulation modelling is required to support the highway impact analysis for the development proposals. Please refer to the advice of TfL date June 2019 in respect of modelling requirements with the scope to also include the junction of Wood Lane/Northumberland Avenue. There is no need at this time to include the A315 junctions with Syon Lane, Wood lane, or Spur Road but it is noted that the A315 will form Cycle superhighway 9. Changes are proposed to Busch Corner and the applicant needs to be aware of this, with modelling to be made available by LBH. There may be a need for additional modelling at these 3 junctions on receipt of details of trip generation and trip re-distribution.
- 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:

Shane Baker

Deputy Head of Opportunities
Areas and Growth

Date: 11 October 2019

Scoping Opinion
Audited by:

Sarah Scannell

Assistant Director Planning and Development

Date: 11 October 2019

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



APPENDIX 1

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



London Borough of Hounslow

Hornbeam House
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Electra Way
Crewe
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



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.
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* 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		<p>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).</p> <p>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.</p>
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>
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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:



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: 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

.

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,
Denham Way,
Rickmansworth,
WD3 9SQ

Tel:020 3577 9998

Email: devcon.team@thameswater.co.uk

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Historic England

Mr Shane Baker
London Borough of Hounslow
The Civic Centre
Lampton Road
Hounslow
TW3 4DN

Direct Dial: 020 7973 3774

Our ref: PL00620664

3 October 2019

Dear Mr Baker

**Re: 00505/H/SCOPE1 ENVIRONMENTAL IMPACT ASSESSMENT (EIA)
SCOPING REPORT**

Thank you for your letter of 23 September 2019 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer of the London Borough of Hounslow and the archaeological staff at GLAAS in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





benefits for the future conservation and management of heritage assets.

Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Michael Dunn

Principal Inspector of Historic Buildings and Areas

michael.dunn@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
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Historic England

Mr Shane Baker
London Borough of Hounslow
Civic Centre,
Lampton Road,
Hounslow,
TW3 4DN

Your Ref: 00505/H/SCOPE1

Our Ref: CLO29838

Contact: Sandy Kidd

Direct Dial: 0207 973 3215

Email: sandy.kidd@HistoricEngland.org.uk

01 October 2019

Dear Mr Baker

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2019**

HOMEbase SYON LANE ISLEWORTH TW7 5QE

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.

Recommend No Archaeological Requirement

Thank you for your consultation dated 20 September 2019.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on

Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3000
www.historicengland.org.uk

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archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the Draft London Plan (2017 Policy HC1) make the conservation of archaeological interest a material planning consideration. .

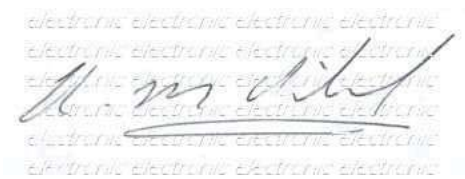
Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The site does not lie within an Archaeological Priority Area and I agree with the applicant's assessment because of the lack of recorded archaeological finds in the vicinity and likely extensive disturbance from modern development.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely



Sandy Kidd

Archaeology Advisor

Greater London Archaeological Advisory Service
London and South East Region

Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3000
www.historicengland.org.uk

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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

Shane Baker

From: .box.plantprotection <plantprotection@cadentgas.com>
Sent: 19 August 2019 11:13
To: Planning Objections
Subject: Our Ref: NL_GE4A_3NWP_019230 Your Ref: SC/2019/2802 (KK) Site Address:
Tesco Superstore Syon Lane Isleworth TW7 5NZ

Categories: Dione

Planning,

Should you be minded to approve this application please can the following notes be included an informative note for the Applicant

****PLEASE NOTE – the below information is related to Low and Medium Pressure Assets. You may be contacted separately by our engineers regarding High/Intermediate Pressure Pipelines.****

Considerations in relation to gas pipeline/s identified on site:

Cadent have identified operational gas apparatus within the application site boundary. This may include a legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent assets in private land. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained from the landowner in the first instance.

If buildings or structures are proposed directly above the gas apparatus then development should only take place following a diversion of this apparatus. The Applicant should contact Cadent's Plant Protection Team at the earliest opportunity to discuss proposed diversions of apparatus to avoid any unnecessary delays.

If any construction traffic is likely to cross a Cadent pipeline then the Applicant must contact Cadent's Plant Protection Team to see if any protection measures are required.

All developers are required to contact Cadent's Plant Protection Team for approval before carrying out any works on site and ensuring requirements are adhered to.

Email: plantprotection@cadentgas.com Tel: 0800 688 588

Kind regards
Plant Protection

Cadent Gas Ltd

Block 1, Floor 1, Brick Kiln Street, Hinckley LE10 0NA


T 0800 688 588

plantprotection@cadentgas.com

cadentgas.com

Self Service for Plant Enquiries:

www.beforeyoudig.nationalgrid.com

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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

Homebase and Tesco sites, Syon Lane, Hounslow

Planning Application Local
Modelling Overview

13 June 2019



Introduction

This document sets out Transport for London's (TfL's) view on the required approach to local traffic modelling for a proposed development re-providing the existing Tesco supermarket on a current Homebase site as well as providing around 2,200 residential units between current Tesco Osterley and Gillette Corner Homebase site

In particular this document sets out a formal response to TfL pre application meeting for – a joint venture between Mount Anvil, A2Dominion and Sainsbury's:

- A transport scoping note with file reference “PB9144-RHD-ZZ-XX-RP-R-0002-S2-P02.1 - Syon Lane Transport Assessment Scoping Study”¹ dated on April 2019. This is referred to below as the **TASS**. All quotations (indented) are from the **TASS**.

A formal TfL pre-application discussion took place on 3rd May 2019.

This note will be subject to change as further information is provided and in the light of ongoing discussions.

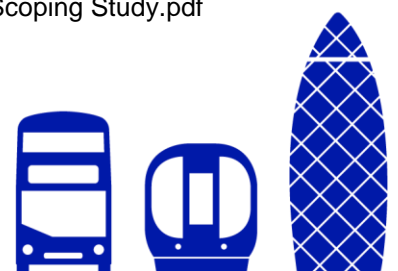
Location of scheme

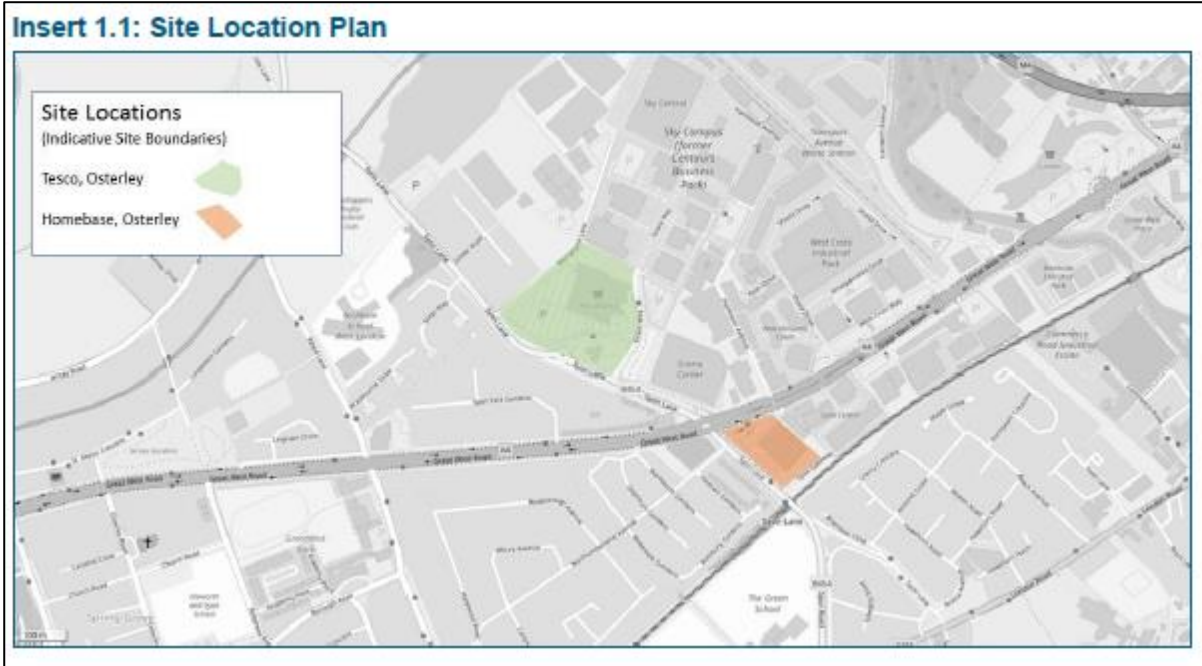
The sites are located on either side of Gillette Corner junction of A4 Great Western Road/ Syon Lane). Site B (as shown below) is adjacent to entrance to Syon Lane rail station:

- **Site A** – Tesco site, located to the east of Syon Lane and to the north the A4 Great West Road. This site consists of an existing Tesco Extra supermarket (circa 8,412sq.m GFA) a Tesco Petrol Filling Station (PFS) and a large surface car park (614 parking spaces).
- **Site B** - Homebase site, located to the east of Syon Lane and to the south the A4 Great West Road. This site consists of an existing Homebase store (circa 4,180sq.m GFA) and a large surface car park (295 parking spaces).

The key road in the area is the A4 Great Western Road which is major TLRN route that links the site with London to the east and Heathrow Airport to the west. Below is a map showing local context of the site's location.

¹ PB9144-RHD-ZZ-XX-RP-R-0002-S2-P02.1 - Syon Lane Transport Assessment Scoping Study.pdf





Source: TASS

At present the Site A is occupied by a Tesco's supermarket with an associated petrol filling station (PFS) and surface car park (614 spaces), with access Syon Lane to A4. The PTAL of the site is 2. Site B (Homebase) comprise a supermarket and associated surface car park (295 spaces)

In terms of public transport accessibility, TfL calculates the Public Transport Accessibility Level (PTAL) for the Tesco site as being 2, which indicates a 'poor' level of accessibility. TfL calculates the Homebase site as having a PTAL rating of 2/3.

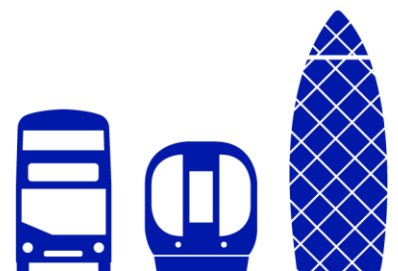
Scheme summary

According to the **TASS** a planning application is anticipated seeking permission for the redevelopment of the exiting Homebase and Tesco sites as follows:

- Site A – Tesco supermarket and PFS will be demolished and replaced by mixed use residential led development of 1,800 units and 10,000 sq.ft commercial floor space

(It is proposed that the existing Tesco Extra store and PFS would be demolished and a new residential led mixed-use development would be constructed in its place.)

The development would consist of circa 1,800 residential units and 10,000sq.ft of commercial floor space)



- Site B – Homebase will be demolished and provide space for new Tesco store with approximately 450 residential units.

(While the Tesco store would be re-provided on the Homebase site the associated PFS would not be re-provided.

The Homebase store would not be re-provided on either development site)

Existing condition

Land use

The site A is currently occupied by a Tesco's supermarket with associated 614 car parking spaces. In addition, within there is a Tesco Petrol Filling Station (PFS). The Site B is located south of Gillette Corner and is home for Homebase sore with associated 295 spaces. In total between tow sites provides over 900 spaces ad over 12,5000 sqm of retail

In combination the two sites currently provide in excess of 12,500sq.m of floor area (GFA) and over 900 retail car parking spaces.

Existing transport network

Pedestrian and cycle access

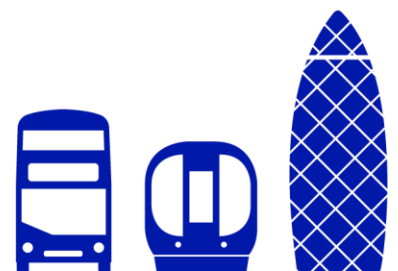
There is no limited information about current pedestrian and cycle accesses. The reference in the TASS states the following:

Pedestrian access to Site A is currently provided in the form of pedestrian footways located to both sides of the main access road to the Tesco car park. The footways connect with the footways on Syon Lane at the access roundabout, providing access to the wider pedestrian network.

Two points of pedestrian access are provided to Site B. One point is located on the A4 Great West Road, adjacent to the junction between the A4 Great West Road and Harlequin Avenue and is provided in the form of a stepped footpath. The second access is located alongside the vehicular access and is provided in the form of pedestrian footways located to both sides of the access

Public transport

Public transport in the area is defined by PTAL of 2 (Site A) and 2/3 (Site B). With respect to buses the nearest bus stops are served routes H28 (North –south axis along Syon Lane) and H91 along A4 Great Western Corridor



The H28 bus route operates from the existing bus stop located at Site A and from bus stops located on Syon Lane in the vicinity of Site B. The bus route provides a service between Site A and Cranford, with a maximum service frequency of three buses per hour.

The H91 bus service is located within a walkable distance from both sites and routes along the A4 Great West Road. The H91 bus service provides a route between Hounslow and Hammersmith.

The route has a service frequency of up to eight buses per hour.

When it comes to rail the nearest station (Syon Lane) is located approximately 500 m south of Site A and 100m to the south of Site B and it is served by 4 trains per hour on London Waterloo via Hounslow loop , Weybridge routes

Syon Lane railway station is on the Brentford loop of the South Western Railway network. Regular services run between Syon Lane and London Waterloo railway stations, with an average journey time of 42 minutes. The fastest journey time from Syon Lane to London Waterloo is 32 minutes.

Road access

As mentioned the main access to both sites are from Syon Lane in the form of priority junction (Homebase) and roundabout (Tesco) sites, described in the TASS as:

Site A is provided with a singular point of vehicular access from Syon Lane (B454), by way of a three-arm roundabout. Syon Lane is a borough road, meaning that it is maintained by the London Borough of Hounslow.

Site B is also provided with a single point of vehicular access from Syon Lane. The junction operates with priority control and a turning lane is provided in the Syon Lane carriageway to accommodate right turners accessing the site from the east.

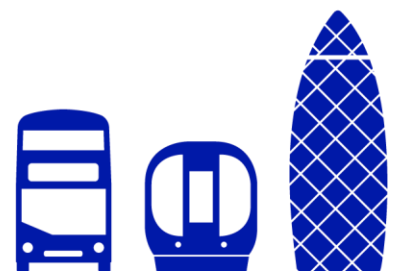
Parking

Current parking provision for Site A is 614 spaces and for Site B it is 295 spaces. At the time of writing it is not confirmed what level of occupancy these two sites have. It is worth noting that Site A is also used as parking drop off for nearby school

Existing trip rates

The TASS doesn't provide details about existing trip rate but is expected that motorised trips will be captured through parking beat and combination of ANPR and turning counts at the access junctions.

As a result of the development proposals, both existing Homebase traffic, and existing dedicated Tesco petrol filling station traffic, would be removed from the local highway



network. The potential traffic attraction of a new retail occupier, on the Homebase site, would also be removed as a consequence of the proposed development.

Background changes

This section sets out the changes that are anticipated within or affecting the area that are unrelated to the proposed development.

Committed development

At present the TASS does not elaborate on committed development. It is expected that the applicant will provide list of committed developments to inform future year scenario analysis:

Given the size, location and a possible long build up programme for both sites, strategic modelling may provide more robust analysis than the above approach.

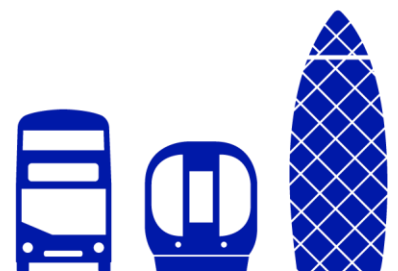
Should strategic modelling be required both types of analysis (outputs of applicant desktop exercise and modelling) should be cross-checked to ensure consistency and robustness of the assessment.

Proposed road network changes

The TASS presents some details on proposed network changes in the area that are outside of the scope of the application. These are both emerging CS9 along London Road (parallel to A4) as well as changes along A4 itself by Shield Drive where new cycle track is being proposed.

The A4 Great West Road cycle track and footway were proposed by TfL and LBH in 2017 and would run between Syon Lane and Boston Manor Road. On review of collision data it was found that there were a number of collisions and near misses involving cyclists and motor vehicles along this stretch of the A4, especially where shared use areas of segregated cycle track passed through the junction. The changes are therefore intended to improve safety for all road users and make cycling a safer, and more appealing, travel option for employees and local residents.

CS9 would route between Kensington Olympia and Brentford, connecting through town centres in Hammersmith and Chiswick. Plans were consulted on in autumn 2017, with two new parts (Kew Bridge to Wellesley Road and Duke Road to Chiswick High Road), to be consulted on in winter 2019. The route from Brentford to Hounslow is subject to a future consultation and is located to the west of the Boston Manor Road improvements.



It is also forecasted that bus route E1 will be rerouted to serve Tesco Osterley site (Site A) As a results H28 may also be rerouted

The applicant should research if nearby network is likely to see operational and physical changes to its highway links and whether completion dates of those can influence outputs of highway impact analysis for the site's opening year. Any highway schemes in the area whether related to borough roads or development driven should also be incorporated in the highway assessment analysis.

Proposed scenario

Land use

At present the proposed scheme makes the following assumptions for site to be utilised:

- The relocation of the Tesco's store from Site A further south to Site B ;
- Residential development both on Site A and on top of the new Tesco's store (Site B);
- The removal of the PFS
- The Removal of existing Homebase store (Site B)

The total number of units to be delivered across the site is yet to be determined; however it is likely that the development will comprise approximately 2,250 residential units (1,800 on Site A and 450 on Site B).

While the Tesco store would be re-provided on the Homebase site the associated PFS would not be re-provided.

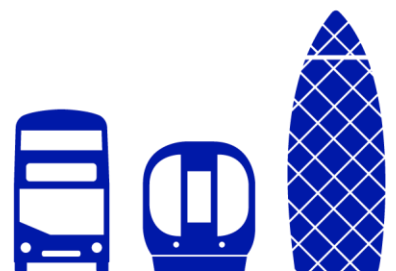
Car parking & Vehicle access

The TASS suggests proposed residential parking ration to be in range of 0.28 across two sites with Site B having 150 residential spaces and Site A 530 car parking spaces:

The development would provide around 530 residential car parking spaces, provided at a car parking ratio of around 0.29 spaces per dwelling, which would be below the maximum permissible provision based on policy contained within the draft London Plan (Policy T6.1).

With respect to retail car parking, the applicant will seek approval for approximately 400 parking spaces:

Site B would provide a new Tesco store at ground floor level with circa. 450 residential units above. It is envisaged that the Tesco store would be provided with 400 customer car parking spaces, with the residential development provided with up to 150 parking spaces.



Highway proposals

The TASS doesn't provide detailed description proposed highway layout changes for Site A but explain current status on access strategy for Site B.

For both sites, vehicular access will be taken from Syon Lane, as existing.

Deliveries to the proposed Tesco supermarket would be undertaken from a dedicated service yard located to the southern side of the site. The servicing yard would be accessed from Syon Gateway, which is located to the south of the site. The servicing yard would be provided with sufficient space to enable vehicles to turn within the curtilage of the site.

It is acknowledged that although not provided electronically the access arrangement as explained in *TfL Presentation Homebase Syon Lane* document for Site B defines a split between parking access for residential and retail and deliveries/ servicing with former being proposed roughly in location where existing access is whilst deliveries and refuse to be sent through Syon Gateway

Local modelling supported by future year flow scenarios will be able to provide further justification for any improvements needed in the area.

Proposed trip generation, mode split, etc.

Trip generation

Existing supermarket trip generation will be determined via on-site surveys (to be undertaken) and supported by ANPR data (as requested at pre application meeting)

It is proposed that the TAs, to be prepared in association with the planning applications for the two sites, would present observed traffic demand to the existing Tesco and Homebase stores, together with traffic movements associated with the existing Tesco Osterley petrol filling station (PFS).

Surveys would establish the traffic demand during weekday morning, weekday evening and Saturday peak traffic periods. The surveys would be supplemented by a store door interview survey at Tesco, which would establish where existing customers are travelling from and to.

Proposed residential trip generation will be based on TRICS. The current forecast is shown in table below (Table 7.1 and 7.2 of the TASS)

A multi-modal assessment of development trip generation would be included within each Transport Assessment, and RHDHV's preliminary assessment of residential trip generation is provided below.

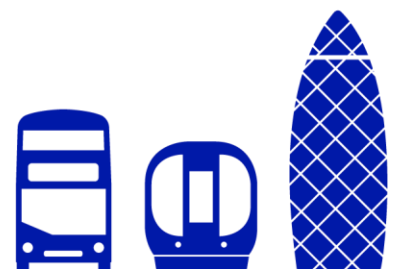


Table 7.1 – Site A: Tesco Site Residential Trip Generation

Mode of Travel	Weekday 08:00-09:00		Weekday 17:00-18:00		Saturday Peak*	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Underground, metro	36	184	117	64	77	124
Train	39	200	127	70	83	135
Bus, minibus or coach	42	213	136	74	89	144
Taxi	1	7	5	2	3	5
Motorcycle, scooter or moped	4	20	13	7	8	14
Driving a car or van	18	91	67	37	42	64
Passenger in a car or van	8	39	25	14	16	26
Bicycle	11	59	37	20	24	40
On foot	28	142	91	50	59	96
Other	2	12	8	4	5	8
Total	189	968	626	342	407	655

*Saturday Peak is an average of the Weekday AM and PM peak hour assessments.

Table 7.2 – Site B: Homebase Site Residential Trip Generation

Mode of Travel	Weekday 08:00-09:00		Weekday 17:00-18:00		Saturday Peak*	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Underground, metro	9	45	29	16	19	31
Train	10	49	31	17	20	33
Bus, minibus or coach	10	53	33	18	22	35
Taxi	0	2	1	1	1	1
Motorcycle, scooter or moped	1	5	3	2	2	3
Driving a car or van	5	26	19	10	12	18
Passenger in a car or van	2	10	6	3	4	6
Bicycle	3	14	9	5	6	10
On foot	7	35	22	12	15	24
Other	1	3	2	1	1	2
Total	47	242	156	86	102	164

*Saturday Peak is an average of the Weekday AM and PM peak hour assessments.

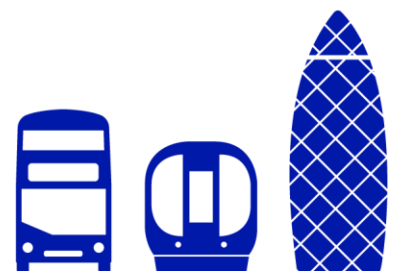
Source: TASS

Proposed supermarket trips are expected to be derived from the survey data and redistributed according to origin and destination of existing trips (through ANPR):

In order to establish the traffic impact of the relocated Tesco development, surveyed traffic movements for the existing Tesco Osterley store would be redistributed from the existing Tesco site to its proposed location.

As Homebase would not be re-provided as part of the new schemes, traffic movements associated with the existing Homebase store would be removed from the road network prior to the assessment of local highway operation. This would be undertaken proportionally through the surveyed road network and with reference to customer the direction of travel at the Homebase access junction.

Lastly, as the current PFS and Homebase will be removed and not re-provided, their vehicular trips will be removed from any modelling.



Dedicated traffic movements associated with the Tesco PFS, i.e. those that do not link a PFS trip with a trip to the Tesco store, would be established through the traffic surveys and would also be removed from the local highway network prior to the assessment of local highway operation. This would also be undertaken proportionally through the surveyed road network and with reference to customer direction of travel at the Homebase access junction.

It is worth noting that there is ongoing conversation about PFS trips rather than being removed completely to be redirected to serve existing petrol station on the A4 western approach of Gillet Corner.

Mode Split

Mode split for is not summarized in provided TASS but it is expected that residential element will be based on both TRICS and 2011 Census data and consider changes to modal split based on proposed car parking ratio.

In order to assess the residential trip generation of the sites by non-car modes, the following methodology is proposed:

- *Residential person trips are to be generated from the 'included' TRICS sites listed in Appendix 1. This methodology assumes that site location, and access to public transport services, does not influence the frequency of residents entering and leaving their homes.*
- *The 2011 'Method of Travel to Work' Census data for the local area is used to distribute trips by non-car modes of travel.*

Disclaimer

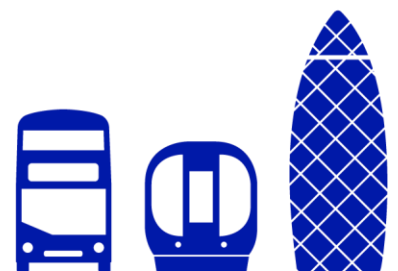
The details of this element of work have not been examined in detail and the inclusion of this information in this note should not be taken as acceptance by TfL.

Highway impact analysis

Introduction

Modelling recommendations are based on discussions with TfL's Network Performance Delivery Area Team representatives well as in-house modelling specialists, and should be considered as TfL's current assessment of the requirements based on information provided by the consultant.

These recommendations and requirements may change as trip generation, mode split, distribution and assignment are developed and agreed.



Study area

Consultant proposal

The consultant has put forward the proposal that highway impact assessment should be limited to the Sainsbury's access junctions only:

It is considered that the scope of modelling required to assess the impact of the proposed developments will consist of Linsig modelling of the A4 Great West Road/Syon Lane junction and junction modelling of the proposed site accesses.

TfL Requirements

Based on the site's location, the importance and complexity of the local highway network (TLRN) as well as predicted changes to the flow demand and assignment, it is expected that the area coverage that includes following junctions / signals.

- Syon Lane / Grant Way (Rbt)
- Syon Lane/ Tesco access (Rbt)
- 25/013 & 25/287 - Syon Lane / A4 Great Western Road (Signalised)
- Harlequin Avenue / A4 Great Western Road (Signalised)
- Syon Lane/ Northumberland Avenue (Priority)
- Syon Lane/ Homebase access (Priority)
- Syon Lane/ Syon Lane Gateway (Priority)
- 25/156 & 25/157 – Syon Lane / Northumberland (Signalised Crossings)
- 25/301 - Syon Lane Station (Signalised Crossing)
- 25/014 - Syon Lane / Wood Lane (Signalised)

A summary map indicating above scope is shown below.

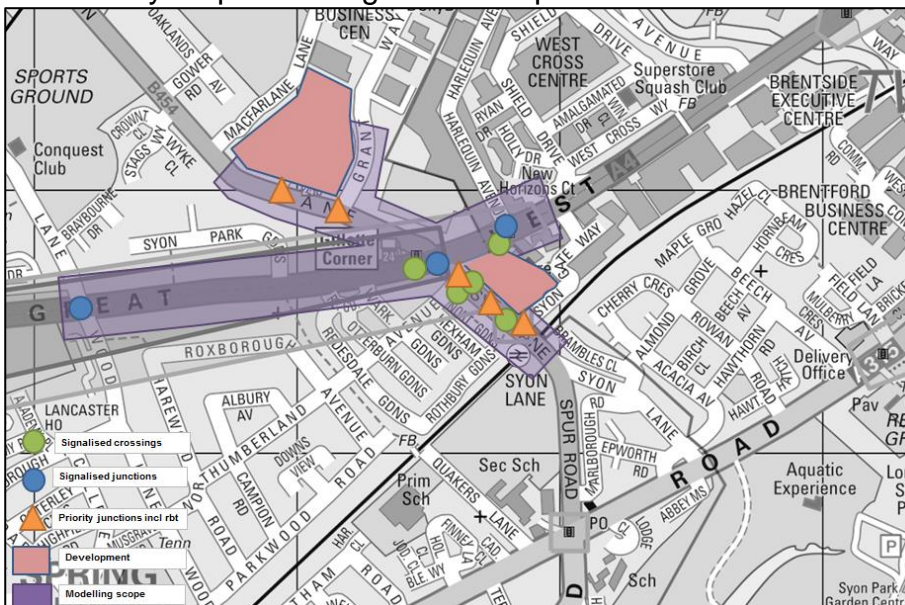
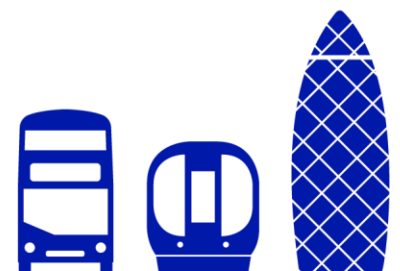


Figure 1: TfL - Modelling and Survey Scope



The inclusion Wood Lane junction will allow replicating A4 arrival patterns from west – this is likely to be modelled through coding in current signal operation and at this stage it isn't envisaged that MCC counts would be needed as well.

Model time periods

Consultant proposal

Provided TASS doesn't detail modelling parameters but it is assumed based on recently submitted scope of surveys (*PB9144-RHD-ZZ-XX-RI-R-0001-S3-P01.1 - Syon Lane, Draft Traffic Survey Brief*), it is assumed that apart from AM and PM weekday peaks, a Saturday model will be developed to capture impact of operational changes on retail peaks:

Surveys would establish the traffic demand during weekday morning, weekday evening and Saturday peak traffic periods.

TfL requirements

TfL accepts the applicant's choice of modelling scenarios (AM, PM and SAT) but wishes to have better understanding of actual network peaks before assessment hours are chosen for analysis. It could be that network peaks are different from assumed development peaks, particularly given the close proximity of a number of schools and the consequent impact on pedestrian and vehicle demand patterns.

Modelling tool and flow scenarios

Consultant proposal

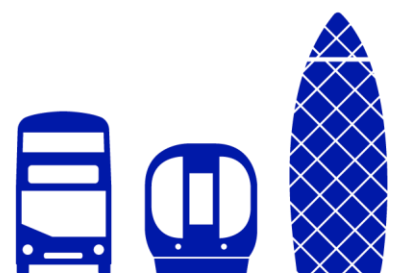
The consultant has suggested that a combination of LinSig and PICADY as suitable tools for traffic assessment.

It is considered that the scope of modelling required to assess the impact of the proposed developments will consist of LinSig modelling of the A4 Great West Road/Syon Lane junction and junction modelling of the proposed site accesses.

Junction modelling, using the PICADY software, would be undertaken to assess the suitability of a priority controlled junction for access to the proposed development. If the priority controlled junction is deemed unsuitable to support the proposed development due to capacity constraints, then the upgrading of the vehicular access to a signal controlled junction would be explored.

Modelling for a signalised junction would be undertaken using the software Linsig.

With respect to modelling scenarios the applicant hasn't explicitly mentioned those in provided TASS



TfL requirement

It is expected that the applicant will consider as minimum the following scenarios:

- Base Scenario (2019) = existing baseline;
- Opening Year (2034) Future Base - (Growth + Committed Dev+ Current Site Activity)
- Opening Year (2034) Do Something - (Growth + Committed Dev+ Dev Site flows including proposed highway layout)

TfL believes that the above analysis based on Opening Year scenarios will capture the net impact of the development. Above list presents core of analysis required - It could be that additional modelling scenarios will emerge from decision with TfL and the borough that could may be related with sensitivity scenarios, phasing of development or introduction of emerging highway schemes in the area

Further discussion is also needed to establish a correlation between strategic analysis and local modelling. That may also require further enhancement of base modelling to ensure close correlation. That includes flow/turning count checks as well as signal operation analysis to ensure that network and individual junctions' capacities are well represented in both models.

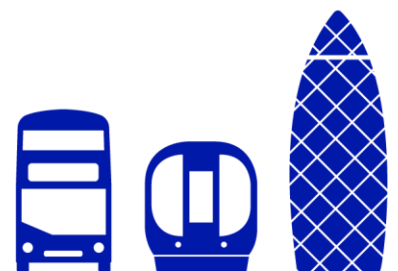
Given the size of the scheme as well as the combination of current network performance and expected growth and reassignment from new development (i.e. the impact of additional trips on the network), microsimulation modelling is required to support the highway impact analysis for the development proposals.

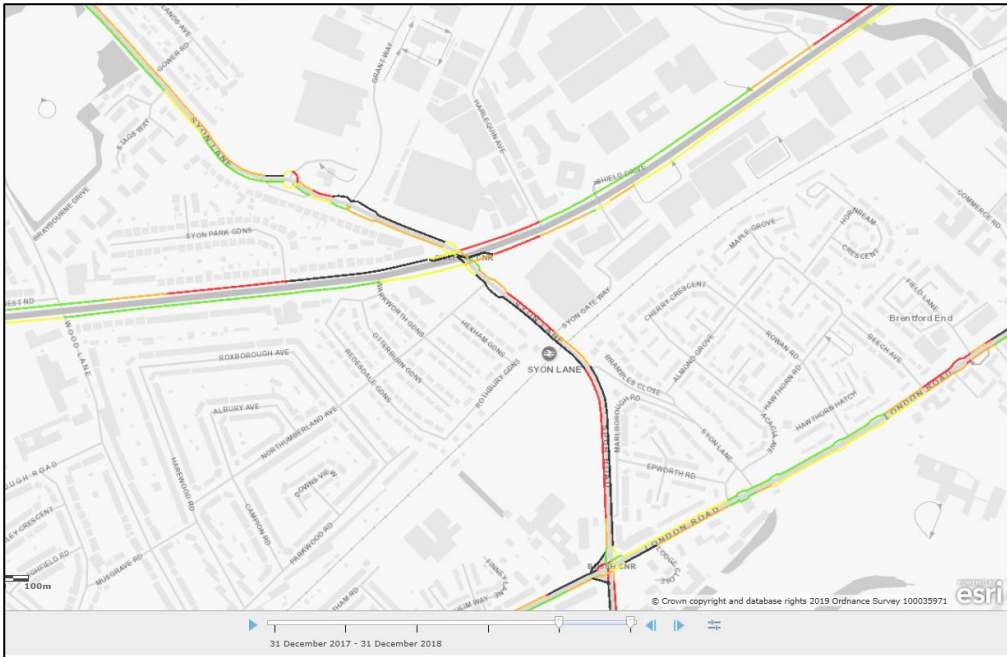
It is expected that ongoing discussions with the applicant and the London Borough of Hounslow about the level of intervention needed will result in final scope of modelling.

Proposed scope of modelling

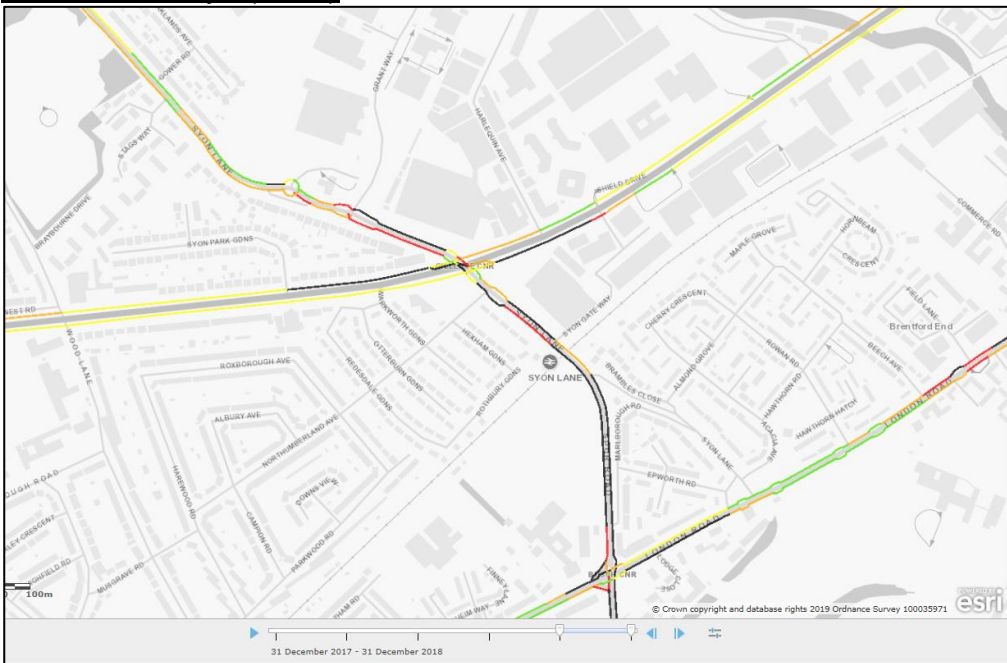
Proposed scope has been defined in paragraph above and summarised in Figure 1./ Details of analysis will be later on defined during Stage 1 MP meeting. It is worth noting that model scope may be extended to reflect queue formation on external links. Therefore queue survey should be carried out as well as supportive data set to be used during for model validation process.

The map below shows the level of network resilience in both AM and PM peaks with black marks showing delays over 1.5 min/km.

AM Peak Delays (2018)

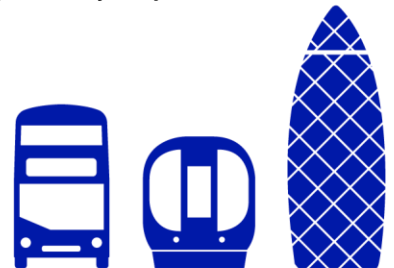


PM Peak Delays (2018)



Summary

The consultant's proposal to use LinSig and PICADY models of Gillette Corner and access junctions. As discussed during the pre app meeting this may not be appropriate due to significant level of friction from multi directional highway interaction (give way in junctions



in proximity of two signalised stop lines, queueing back through priority controlled junctions (Syon Lane / Grant Way) and complex driving behaviour (three lanes of opposing signal controlled operation). Instead it is expected that accurate reflection on current and proposed operation is likely to be captured in a more robust way if carrying the assessment using microsimulation models.

It is expected that all three major peaks (AM, PM and SAT), and potentially an additional weekday school-end peak if considered necessary following presentation of survey data, will be modelled and the exercise will be carried out using a microsimulation package. The details of base year and future years assessments including strategic analysis input and its representation in microsimulation modelling should also be discussed before the proposed methodology is deemed accepted.

As per TfL's TA Guidelines, the final modelling analysis will need to be shared with TfL prior to submission to ensure enough time is allowed for the audit to be performed prior to the application's determination.

Therefore the modelling results will only be viewed as final once a model audit is complete.

Model availability and audit

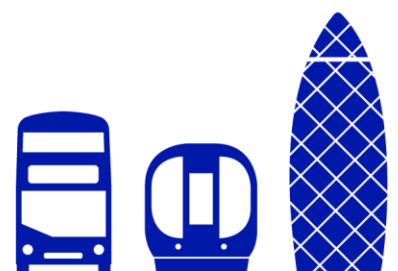
Any modelling that forms part of the application analysis is subject to a TfL audit for which a charge will be made to the applicant and is subject to separate discussion depending on the scale and complexity of models needed.

TfL is often in possession of models that could support highway impact analysis work. Those can be leased or purchased by the applicant to reduce time and cost required to have a model built and approved by TfL – as these are the intellectual property of TfL they are also subject to a fee which again depends on the validity and complexity of the model.

Should the consultant be interested in exploring possibilities of obtaining copies of TfL models and through Process for Commercial Access to Modelling (PCAM), please contact John Green for details (John.Green@tfl.gov.uk)

Quality assurance

In order to ensure that the quality of models meet TfL's standards any models provided by the consultant will need to be assessed against TfL's benchmark criteria set up in TfL's Modelling Guidelines and Model Audit Process (MAP) documents – these would apply to both base and proposed models. Should the consultant decide to develop models externally (instead of using MAP approved models obtained from TfL), they will be requested to send those models for TfL audit prior to sharing the results in the TA.



Models are expected to be developed to MAP standards which will guarantee the quality of the modelling assessment. Technical notes should include all validation and calibration data as well as a description of all modelling assumptions and caveats including those in base modelling carried over to proposed modelling. That applies to all industry-standard software packages.

Models which use flow demand from strategic analysis should have an additional check performed to ensure that, both on strategic and local level, crucial junctions nearby the site are reflecting the same network constraints. This will require checking signal timings, stage sequence and turning counts on both models at the base case level prior to any future year flows and routing are transferred into local models.

All models should also be available for checks and submitted in advance before the planning application is due for submission. Should you have any questions please refer to TfL Modelling & MAP guidelines for more information.

Additional comments

Separate discussion should be carried out with the Strategic Modelling team to ensure that strategic impact is accurately reflected in the Transport Assessment.

Programme

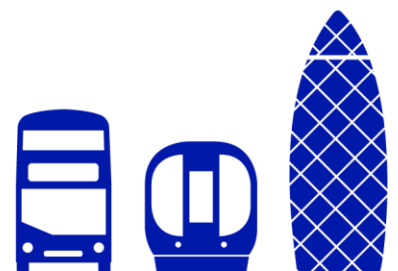
In order to ensure smooth modelling audit process the consultant is asked to provide a modelling programme with expected modelling submission dates as well as a forecast planning application submission date.

Documentation

This note does not supersede TfL's Modelling Expectation Document, Modelling Guidelines Version 3.5 or MAP process guidelines. These guideline documents should be used for model build, calibration and validation. Please consult TfL for any issues during modelling process.

Contact Details

Michal Miklasz – Modelling Liaison – Spatial Planning/ Network Performance Delivery
Claire Farrow – Principal Engineer (West) - Network Performance Delivery
Andrew Rogers - Performance and Planning Manager (West) - Network Performance Delivery





Shane Baker

From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 15 August 2019 09:05
To: Amna Javaid; Planning Objections
Subject: RE: External Stat Consultation - App ref SC/2019/2802

Categories: Dione

Site: TESCO SUPERSTORE SYON LANE ISLEWORTH TW7 5NZ

Proposal: Scoping opinion for proposed residential led, mixed-use development of the Osterley Tesco site, Syon Lane, Isleworth, Hounslow, TW7 5NZ

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.

Kind regards

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: 02 August 2019 15:23
To: Location Enquiries
Subject: External Stat Consultation - App ref SC/2019/2802

Please find attached document

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Shane Baker

From: Pak-Lim Wong <PakLim.Wong@tfl.gov.uk>
Sent: 25 September 2019 12:51
To: Shane Baker
Cc: Robert Heslop
Subject: Re: 00505/H/SCOPE1; Homebase Syone Lane, Isleworth _ EIA Scoping

Dear Shane

Re: 00505/H/SCOPE1; Homebase Syon Lane, Isleworth _ EIA Scoping

Thank you for consulting TfL on the above Scoping Opinion. After assessing the EIA Scoping Report TfL makes the following comments:

- TfL understood that the applicant has already engaged pre-application discussions with both GLA and TfL, therefore pre-application advices given by both organisations should be taken into consideration when producing the EIA assessment.
- The EIA Scoping report recognises the need for a Transport Assessment (TA) to be submitted and this is welcomed. Rather than referring to the 2007 DfT TA guidance set out in para 6.5 of the Scoping note, the TA must be produced in line with the latest TfL's Transport Assessment Best Practice Guidance.
- The EIA and TA must take into account the Mayor's Transport Strategy (MTS) and the new Draft London Plan and should in particular reflect policy approaches such as the "Healthy Streets, planning for Good Growth" and the Mayoral Mode share targets, as well as Vision Zero agenda. As such, the development needs to be designed in order to achieve mode shift in favour of walking, cycling and public transport.
- The TA must take into account the potential changing dynamic of operational for Gillette Corner junction and A4 which are already experiencing congestion and within the Great Western Corridor Opportunity Area. Highway and traffic impact assessment must be carried out in accordance with Pre-application advice previously given by TfL. The applicant must undertake the modelling as well as strategic assessment discussion in TfL's Pre-application advice.
- Any highway modification/ public realm improvements must be designed in line with TfL's current Streetscape Guidance.
- It is understood that the proposal comprises the provision of 400 retail car parking space, TfL is of an opinion that the proposed level of provision is excessive and do not comply with Draft London Plan policies and Mayor's Transport Strategy objectives. The applicant must demonstrate that proposal would not be designed to attract trip generation primarily for cars and offers significant improvement to local walking/ cycling environment as well as local public transport facilities within walking distance to the site, while car parking must be reduced to minimum level to minimise impact to A4 Great West Road/ Gillette Corner junction.
- The impact of construction traffic on buses, pedestrians and cyclists must be considered and could be mitigated through the provision of a Construction Logistics Plan (CLP). TfL would encourage the applicant to submit a framework CLP as part of the application.
- TfL would require the submission of a framework Delivery and Servicing Plan (DSP). Details on DSPs can be found at <http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

- A Travel Plan for all elements of the proposal should be submitted within the supporting information of the application for each of the uses on site, in accordance with TfL's Travel Planning best practice guidance. Details on travel planning can be found at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>
- The development will be liable to pay the Mayor's Community Infrastructure Levy (CIL), the rate of which in the London Borough of Hounslow is £60 per sqm.
- Any mitigation measures relating to TfL infrastructure and services must be secured through a S106 agreement. Depending on the level of transport mitigation agreed, it may be appropriate for TfL to be a signatory. Less significant issues can be dealt with by use of planning conditions. In some cases TfL may request that it is consulted prior to any discharge of a condition.

If I can be of any further assistance, please do not hesitate to contact me.

Kind Regards,

PakLim Wong

Planning Officer

City Planning, Transport for London

5 Endeavour Square, Westfield Avenue, Stratford E20 1JN

Tel: (020) 3054 1779 | Auto: 81779 |

Email: paklim.wong@tfl.gov.uk

For more information regarding the TfL Borough Planning team, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit

<http://www.tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications?intcmp=3484>



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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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OSTERLEY TESCO & HOMEBASE ENVIRONMENTAL IMPACT ASSESSMENTS

SCOPING OPINIONS FOR:

A. Proposed residential-led, mixed use development of the Osterley Tesco site, Syon Lane, Isleworth, TW7 5NZ (ref: SC/2019/2802)

and

B. Demolition of Homebase store and the construction of a new residential-led mixed development of mixed-use development of up to 450 residential units and 8500 sqm of commercial floorspace (ref: SC/2019/2727)

Comments from Osterley and Wyke Green Residents' Association (OWGRA), 3 Sept 2019

A. TESCO OSTERLEY (current site), Syon Lane, TW7 5NZ, ref: SC/2019/2802

1. Principle of residential development

OWGRA consider that a residential use of the site is acceptable in principle. The issue we have is the size and height of the proposals at up to 16 storeys, which would give rise to an unacceptable level of development so close to 2-storey housing in a suburban setting, giving rise to overlooking, overshadowing and reduction in sunlight. The site is on high ground and is visible from near and far including locally significant places such as Osterley Park, Syon Park and Kew Gardens and such intensive and high-rise development would not be appropriate. OWGRA consider that any new residential development should be restricted to 3-4 storeys maximum to mitigate the effect on existing local residents and the nearby sensitive sites listed above. OWGRA are surprised at the size of the proposals as the recently (July 2019) released LBH Local Plan Review Site Allocations indicates that Tesco Osterley will be redeveloped into a mixed-use site incorporating housing and an enhanced public realm. 450 residential units are recommended, far below the 1,800 proposed by Berkeley Homes and the heights of the buildings must be in conformity with Great West Corridor West Place Policy and Great West Corridor Masterplan.

2. Quality of residential development

As yet, there are no specific design or architectural features available; OWGRA strongly urge details to be made available of what is proposed, given the sensitivity of the site. Local residents have lived for some 20 years with a less than attractive Tesco superstore and we see this proposal as an opportunity to provide something pleasing for our area.

3. Air quality and wind microclimate

This area suffers from poor air quality not least from being on the flight path to Heathrow and associated road traffic. It will no doubt worsen should Heathrow be granted consent for a third runway which will increase the number of planes flying directly overhead. With up to 16 storeys of house-building and associated much higher density, there will also be a worsening of a wind tunnel effect in terms of pedestrian and cyclist discomfort and potentially dangerous situations. This is not acceptable in OWGRA's view. Again, building heights should be no more than 3 or 4 storeys to avoid this.

4. Daylight, sunlight and overshadowing

It is alarming to see in the EIA report that many properties in Osterley, in the Wyke Estate, Syon Lane and Oaklands Avenue, will suffer from much reduced daylight, sunlight and from substantial overshadowing given the proposed building heights. This is not acceptable and the building heights should be reduced to a maximum of 3 or 4 Storeys

5. Transport and accessibility

1800 new homes proposed means some 4000 new residents. The existing transport facilities barely cope with the existing number of residents in the area. We note there are no proposals for adding to transport facilities. OWGRA believe here should be at least an increase in bus services funded by the developers.

6. Visual effects on existing 'townscape' and heritage sites

OWGRA are alarmed to see such tall buildings on this prominent site, sticking up like sore thumb! The existing Tesco building sits fairly comfortably in an established suburban area given its 2-storey building amongst many other 2-storey residential established developments on Syon Lane, Oaklands Avenue and the Wyke Estate. The wider area to the north and west comprises large tracts of Metropolitan Open Land (MOL) with sports use, educational establishments and Osterley Park, operated by the National Trust, plus, to the south and east, a variety of commercial activity along the Great West Road 'Golden Mile'. Further afield to the south are Syon Park and House and, over the Thames, Kew Gardens. All are sensitive to any new development particularly high-rise. OWGRA consider that up to 16 storey housing is not appropriate on this site as it would cause substantial harm to the existing townscape and nearby heritage sites.

Scoping report requires updating as follows:

5.6.4 "Land south of Gillette (previously former Syon Lane gate service station) Corner, Great West Road, Isleworth"

OWGRA comments: The up-to-date information on this site is that approval was granted for P/2018/4691 at the 2.5.19 LBH Planning Committee meeting as follows:

"That planning permission for planning application 00505/AF/P28 for the erection of up to six storey building to provide class B1 (office) and class B8 (self-storage) uses, with associated car parking and landscaping at former Syon Gate Service Station, land south of Gillette Corner, Great West Road, Isleworth be approved, subject to conditions set out in the report and the prior completion of a satisfactory S.106 agreement or unilateral undertaking, set out in section 10.0 of the report and heads of terms as set out in section 7.72 of the report and the addendum report. b) That highways works would be included in the S.278 agreement and junction works would be approved under the S.106 agreement. c) That there would be an additional condition restricting operational hours to 7-11 Monday to Saturday and 10-6 on Sundays and bank holidays. d) That there would be a management plan, specifying what goods could be stored on the premises. e) That condition 6 is updated to refer to B1 (not B1c) use class. f) That details of the S.278 works, materials and landscaping condition to be shared with the Chair and ward members before approval is given."

It should be noted that OWGRA and the developer have worked closely together over a period of 2.5 years to reach agreement on this development which started out as a 14 storey block, then went down to 11 storeys and is now 6 storeys.

7.1.3 "Availability of primary healthcare facilities in the local area will be assessed by using published NHS data. This information will be compared with the population forecasts for the

proposed development to estimate the likely effect on primary healthcare facilities. Due to a lack of information about waiting lists for dental practices, it would not be possible to undertake a robust and meaningful assessment of the need for potential additional dentists arising from the proposed development. Therefore, this element of primary healthcare will not form part of the assessment;”

OWGRA comments: With the increase in local population at the two sites and along the Great West Corridor a new health centre should be incorporated on the Tesco site.

[The nearest health centres are struggling to cope with the increased populations from all the developments in Brentford (Brentford Health Centre, 1 mile away to the east) and along the London Road on the border of Isleworth and Hounslow (Thornbury Road/Spring Grove practices over a mile away to the west).]

“Provision of community facilities such sports facilities, community centres and libraries will be assessed in relation to existing provision and the demand generated by the proposed development;”

OWGRA comments: A gym at one of the two sites would be very welcome, open to all local residents, as the nearest gym, Top Notch, is rumoured to be closing.

A new hill is requested for the local area. London National Park City

(<http://www.nationalparkcity.london/>) are promoting the building of hills for exercise purposes.

Northala Hills, four man made hills in Northolt, built from the rubble from the rebuilding of Wembley, have proved very successful, and are very popular

(<http://www.londongardenstrust.org/features/northala.htm>). Can the rubble from the demolition of Tesco and Homebase be used to build a hill or two in our area eg along Windmill Lane (opposite Seccombe on Council land between the tube line and Wyevale Garden Centre), or in Boston Manor Park, or in Gunnersbury Park? We are very lacking in hills in West London. The nearest ones for us in Osterley are Northala Hills and Richmond Park, both a drive away and difficult to get to by public transport.

7.2.1 “In terms of cycling, a defined off-carriageway route is provided adjacent to the A4 Great West Road. The facility provides a link to Osterley town centre to the west and Boston Manor Park and Chiswick to the east.”

OWGRA comments: The cycle track along the A4 has an uneven surface and needs resurfacing, so quite a few cyclists don’t use the cycle path but cycle along the main carriageway of the A4 (and this is dangerous).

“Construction of Cycle Superhighway 9 is planned to start in 2019 with the route expected to be complete by 2021. CS9 will provide a 7 km section of cycleway between Kensington Olympia and Brentford. The new cycle superhighway would support journeys by cycle from the site towards Central London.”

OWGRA comments: CS9 is not planned to go along the Great West Road, so will not go near this site.

7.2.3 “Subject to agreement with TfL, traffic growth factors could be applied to observed baseline traffic flows to estimate future year traffic flows. However, DfT survey data for the A4 Great West Road indicates that this road has not been subject to background traffic growth since the year 2000.”

OWGRA comments: Gillette Corner is very dangerous for cars, cyclists and pedestrians and needs to be reconfigured to deal with the increased traffic that will use Tesco if it moves to the Homebase site.

7.3.1 *“The whole of the borough has been declared an Air Quality Management Area (AQMA) for exceedances in NO2 levels. Existing air quality at the site are impacted from road traffic emissions on the main road network to the south of the site. Ground level air quality concentrations predicted by the London Atmospheric Emissions Inventory suggests exceedance of relevant air quality objectives close to the main road network including the Great West Road and Syon Lane (B454) although concentrations would be expected to decrease to within relevant objectives over the majority of the site.*

There is limited air quality monitoring data representative of site conditions collected by the LBH. The closest is located at the junction of the A310 and A315 over 750 m south of the site. Other local monitoring data is clustered close to the A4 and would not be representative of site conditions. It is therefore proposed to carry out a diffusion tube monitoring survey to assist in establishing baseline conditions. This data together with the existing monitoring data would be used to help verify the traffic pollution dispersion model.”

OWGRA comments: The air quality in the area is poor. In summer 2018, OWGRA conducted its own analysis of air quality using diffusion tubes: a report was sent to LBH. Also, no mention is made of pollution from aircraft and the possible impact of the 3rd runway at Heathrow as plans would fly directly over this site.

7.5 *“A wind microclimate technical assessment will be presented in ES Volume 1. The assessment will be undertaken by RWDI and will consider the potential wind impacts of the proposed development; particularly with regard to the suitability of the proposed development for the intended pedestrian and occupier use, as well as unsafe wind conditions as designated by the Lawson Comfort Criteria54.”*

OWGRA comments: The potential for a wind tunnel along the proposed green corridor down the middle of the site needs to be addressed.

B. HOMEBASE SITE, SYON LANE, ref: SC/2019/2727

Principle of development as a Tesco store with housing above: OWGRA consider this to be acceptable; again, the proposals for up to 16 storeys is not right for this site. It is opposite and to the north of 2-storey homes in a suburban setting, the Northumberland Estate in Isleworth and the 'Trees Estate' in Brentford. The site is on high ground sloping down 4m within the site towards the south and the River Thames. Up to 16 storeys would be highly visible from Osterley Park, Syon Park and Kew Gardens. Heights of new buildings must be in conformity with the Great West Corridor Policy and Masterplan. OWGRA believe up to 6 storeys in total would be acceptable. At the time of writing, the LBH planning website is not available so it is not possible to view any documents. However, Historic England has sought independently comments from OWGRA on 28 August 2019 on a proposed Certificate of Immunity from listing of the Homebase Tower, no doubt to facilitate the development of the site for a Tesco store and housing. OWGRA are against this proposal and will submit shortly to Historic England a petition from local residents to that effect. We think the Grimshaw Suspension Tower should be listed and had previously asked LB Hounslow to list it locally but this was declined.

Scoping report requires updating as follows:

1.10 "Although there are no listed building located on the site, there are a number located in the immediate surrounding area. The nearest listed building to the site is the Grade II listed part of former Coty Factory, located approximately 40m to the east of the site. There are also a number of listed buildings located to the north of the site, immediately beyond Great West Road. These include the Grade II listed National Westminster Bank, and the premises of Gillette UK Ltd. No. 891 Great West Road, located approximately 120m to the west of the site is a locally listed building."

OWGRA comments: This is a major error, as the Gillette building is Grade II listed and is immediately to the north west of the site. The building at 891 Great West Road (to the west of the site) is the Adini building and it is locally listed. This error is repeated in para 4.4.

1.11 "The Isleworth Riverside Conservation Area is also located approximately 450m to the southeast of the site and the Grand Union Canal and Boston Manor Conservation Area is located approximately 450m to the northeast of the site. The nearest Local Nature Reserve (LNR) to the site is Blondin Nature Area LNR, located approximately 1.2km to the north of the site."

OWGRA comments: There are 2 local conservation areas that have been omitted: Osterley Park Conservation Area and Spring Grove Conservation Area.

2.10 "The site comprises an existing urbanised area that lies within Environmental Zone E3 (i.e. a medium district brightness area) as defined by the Institute of Lighting Professionals². The proposals are not anticipated to produce a significant lighting effects due to the nature of the proposed development and the site. As such, this topic has been scoped out of the ES."

OWGRA comments: The proposed development will tower over the Northumberland Estate to the west (consisting of 2 storey maisonettes) and will have considerable lighting effects on that estate so should be included in the ES.

5.7 "The site is not located within any of the protected view corridors, as defined by the London View Management"

OWGRA comments: Presumably this is incorrect if this site is opposite the Grade II listed Gillette

building and there are protected sightlines from Syon Park in the Local Plan.

11.3 (Approved schemes)

OWGRA comments: There is no mention of the recently approved Access Storage building (P/2018/4691) – up to 6 storeys – approved on 2.5.19 and final details re S106 and S278 are awaited.