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Our Ref: 62261659  
21 January 2021

Dear Kiri,

**Osterley Place, Tesco Osterley**  
**Application ref: P/2020/3100**

We write to submit additional and amended information in connection with the application for proposed residential-led mixed-use development of Tesco Osterley at Syon Lane, Brentford, TW7 5NZ.

**Summary of Changes to the Proposed Development**

Following consideration of the comments on the planning application, and through discussion with officers, the following amendments have been made to the proposed development:

- Revised energy strategy to adopt a site wide heat network based on air source heat pumps and taking the opportunities to introduce PV panels on the available roof space, delivering a 59% on-site reduction in carbon emissions;
- Reduced the depth of development parcel of the houses on Macfarlane Lane (Block J) to ensure a minimum of 18m separation to properties in Oaklands Avenue and minimum rear garden depth of 5.6m;
- Associated changes to the details in the Design Code that control the detailed design of these houses on Macfarlane Lane;
- Replaced the 3m shared pedestrian/cycle route along the frontage of the site with Syon Lane with a 4m segregated cycle/pedestrian route to improve accessibility;
- Basement and ground floor of Block F set back out of the root protection area of the existing oak tree on Macfarlane Lane;
- Introduced flexibility to allow for alternative options for the incorporation of the bus stops and turnaround facility with the site, either at the northern end of Grant Way as previously proposed or at an alternative location within the site, with the final location to be agreed as part of the reserved matters details;
- Introduced associated flexibility for the location of the single storey mobility hub adjacent to the bus stop (with no change to nature or scale of this building);

- Set minimum floorspace amounts for groupings of uses within the non-residential floorspace to ensure the final development delivers a mix of retail, employment and community uses (with no change to overall minimum and maximum extents of non-residential floorspace used in assessments); and
- Widened the housing mix for intermediate homes to allow for the potential of no studio homes and some 3-bed homes within this tenure. Amended mix for London Affordable Rented homes to remove any provision for studio homes and to include range for 3-bed homes within this tenure.

No changes have been made to the description of the proposed development.

The changes to the key elements of the proposed development are much the same as listed in 3.1.2 of the Planning Statement, with the amendments identified in **bold** below:

- Up to 1,677 new homes;
- 35% affordable housing by habitable room;
- Between 3,000 sqm and 5,000 sqm of non-residential floorspace, including commercial, business and service space, and/or learning and non-residential institution space, and/or local community space, and/or public house/drinking establishment;
- Buildings heights ranging from two to 17 storeys;
- A minimum of 20,000 sqm of publicly accessible open space, which includes three new public open spaces;
- A minimum of 8,000 sqm of communal amenity space at podium and roof level;
- A minimum of 5,000 sqm play space split between public ground floor area and communal podium/roof levels;
- Planting of a minimum of 300 new trees;
- **Site wide heat network based on air source heat pumps with PV panels on the available roof space;**
- Up to 400 car parking spaces, including a minimum of 10 car club bays;
- 20% of car parking spaces to be electric vehicle charging points, with remaining spaces to be passive;
- Intend to Publish London Plan compliant cycle parking;
- Public route through the Water Gardens to be retained and enhanced;
- A mobility hub and bus welfare facilities; and
- A new bus turning facility for Route E1 and H28 buses.

### **Summary of Additional Information and Assessment**

In addition to the amendments summarised above, this submission also includes additional information to supplement the assessment of the proposed development. This includes:

- Updated peak hour traffic modelling based on discussions with TfL, including assessment of an alternative scenario for off-site highway improvements to the Great West Road junction; and
- Assessment of the proposed development in additional townscape views from Kew.

The table below summarises how the individual application documents have been updated or supplemented to reflect the above changes and to provide additional information/assessment as requested by officers or other stakeholders.

<b>Document</b>	<b>Amendments and additional information</b>
<b>Application form</b>	Amended to remove incorrect information on housing mix (with no change to proposed mix as set out in the Development Specifications)
<b>All Parameter Plans</b>	Supersedes originally submitted versions Amended to increase the separation between Block J and the rear boundary and to show the illustrative footprint of the mobility hub
<b>Maximum Development Parcel</b>	Supersedes originally submitted version Amended to indicate the set back of Block F at basement and ground floor level out of the extended root protection area of the existing oak tree on Macfarlane Lane
<b>Access and Movement Parameter Plan</b>	Supersedes originally submitted version amended to include a new, wider zone for bus access to allow either bus route option to be delivered through the reserved matters
<b>Separation Distance Parameter Plan</b>	New parameter plan Shows key minimum separation distances between proposed blocks and between blocks and boundaries
<b>Development Specifications</b>	Supersedes originally submitted version Sets minimum floorspace amounts for groupings of uses within the non-residential floorspace to ensure the final development delivers a mix of uses. Amendments to housing mix ranges for intermediate homes and London Affordable Homes
<b>Design and Access Statement Addendum</b>	Supersedes originally submitted version Amended to reflect the reduction in the depth of the houses on Macfarlane Lane and the incorporation of the 4m segregated cycle route along Syon Lane

	<p>Amended to reflect the potential for either bus route option to be delivered.</p> <p>Amended to reflect the changes to the footprints of Blocks J and F</p>
<b>Design Code</b>	<p>Supersedes originally submitted version</p> <p>Amended to reflect the reduction in the depth of the houses on Macfarlane Lane and the incorporation of the 4m segregated cycle route along Syon Lane</p> <p>Amended to reflect the potential for either bus route option to be delivered.</p> <p>Updated to incorporate elements of the Design and Access Statement on the approach to height and massing and the interrelationship the scale and massing of the proposed blocks across the site.</p> <p>Amended to set 50% sun hours on the ground on 21 March target for all podium gardens except the two identified as 40%, which are subject to justification at reserved matters stage</p> <p>Incorporating a commitment to minimise single aspect north facing dwellings and a requirement that all 3-bed+ homes should be dual aspect</p> <p>Incorporates typical sections through the townhouses</p> <p>Updated to incorporate additional controls on residential quality, such as separation between balconies</p> <p>Sets controls on the houses on Macfarlane Lane (Block J) being two storeys</p> <p>Sets controls on the height and floorspace of the single storey mobility hub</p> <p>Amended to clarify site levels and ensure consistency with Parameter Plans</p>
<b>Transport Assessment</b>	<p>Supersedes originally submitted version</p> <p>Presenting updated peak hour traffic modelling based on discussions with TfL, including assessment of an alternative scenario for off-site highway improvements to the Great West Road junction</p> <p>Demonstrating the technical feasibility of the two alternative bus route options</p> <p>Amended to reflect the 4m segregated cycle route along Syon Lane</p>
<b>Energy Strategy</b>	<p>Supersedes originally submitted version</p> <p>Updated to adopting a site wide heat network based on air source heat pumps, and also taking the opportunities to introduce PV panels on the available roof space. The result is an overall 59% reduction in carbon emissions.</p>

<b>Sustainability Statement</b>	<p>Supersedes originally submitted version</p> <p>Updated to reflect the changes to the energy strategy</p>
<b>Environmental Statement Addendum</b>	<p>Updates to the assessments of bus delay and driver delay within the transport chapter to reflect the updated peak hour traffic modelling</p> <p>Statements on noise and air quality to reflect any material changes in effects associated with the updated peak hour traffic modelling, and the suitability of the site for residential use following the introduction of flexibility on bus routes within the site</p> <p>Addendum to townscape chapter to include assessment of three additional townscape views from Kew</p> <p>Additional appendix to townscape chapter provides a response to stakeholder comments on the selection of additional viewpoints</p> <p>Statement confirming no change to conclusions of the heritage chapter as a result of the additional townscape views from Kew</p> <p>Minor updates to description of development to reflect changes to proposed development</p>
<b>Tree Technical Note</b>	<p>New document</p> <p>Identifies the rationale for the set back at ground and lower ground levels on Block F and the relationship with the existing oak tree</p>
<b>Draft s106 heads of terms</b>	<p>Added detail to the Affordable Housing Delivery to reflect controls on the delivery of affordable housing through the phased delivery of the development;</p> <p>Added new head for Additional Pedestrian Crossing to require the assessment of a staggered pedestrian crossing across the northern arm of the Great West Road junction</p> <p>Added new head for Play Space Contribution requiring the submission of an analysis of playspace provision within the reserved matters and payment of contribution in the event of a shortfall</p>

## Energy

The revised energy strategy adopts a site wide heat network fully reliant on air source heat pumps (removing the reliance on gas) and taking the opportunities to introduce PV panels on the available roof space, delivering a 59% on-site reduction in carbon emissions. This represents a significant improvement from the minimum requirement for on-site carbon savings identified in planning policy, and a significant improvement on the previously submitted strategy reliant on gas boilers, with no 'be green' measures, that achieved a 36% on site reduction in carbon emissions.

As before, the remaining carbon emissions would be offset to ensure that the development is Net Zero Carbon. The revised energy strategy is fully compliant with Policy 5.2 of the adopted London Plan and Policy EQ1 of the Hounslow Local Plan.

## **Transport**

The incorporation of a 4m segregated cycle route along Syon Lane improves the accessibility of the site by non-car modes and improves the pedestrian and cycling environment generally along Syon Lane. This is in addition to the new pedestrian crossings proposed on Grant Way and Syon Lane.

There is no change to the commitment to provide a bus stop and turning facility that would facilitate the extension and expansion of the E1 and H28 bus routes. There is also no change to the commitment to provide bus welfare facilities and a mobility hub. The amendments to the plans merely allow the flexibility for the detailed design of the bus arrangements to be agreed through the reserved matters process, closer to the time of delivery. Option 1 is as previously proposed, with the bus stops and turnaround facility on Grant Way. Option 2 is a variation with bus stops provided within the site.

There are no changes to the total daily traffic flows as a result of the updated traffic modelling. As before, the cumulative effect of the Tesco Osterley and Homebase Brentford developments is to remove traffic from Syon Lane and nearby roads, with a net reduction in traffic on all 11 traffic links assessed. The reductions along Syon Lane to the north of the A4 would be particularly significant with c. 4,000 fewer daily vehicle movements.

Consideration has been given to options for improving pedestrian and cycling accessibility across the Great West Road junction. TfL has requested that the traffic modelling results are presented for four different options for new/improved pedestrian and cycling crossings around this junction in order to inform decision making on future improvements.

Across the course of a day, the cumulative effects of the developments are to reduce overall traffic on the local network. During peak hours, the assessment identifies a redistribution of traffic. The base option, with no additional crossings, demonstrates an improvement in the way the junction operates.

Design option 2 demonstrates that it is possible to improve north-south accessibility across the junction and to improve the way the junction operates, with journey time reductions in the weekday AM and PM peaks, and only a minor increase in the Saturday peak. The provision of an additional north-south crossing, as shown in Option 2, would more than mitigate the effects of the additional pedestrian/cyclist movements associated with the proposed developments. The main pedestrian movements associated with the developments are identified as being in a north-south direction, connecting new and existing residents on the north side of the Great West Road to Syon Lane station and the new Tesco store, and connecting residents on the south side of the Great West Road to the new spaces and facilities to be delivered on the Tesco Osterley site.

Design options 3 and 4 investigate the feasibility of additional crossings to bring wider improvements to pedestrian and cyclist movements, including east-west movements along the Great West Corridor. Whilst these options would deliver greater improvements pedestrian and cyclist movements, the traffic flow through the junction would not operate as well as with options 1 and 2, notably in the Saturday peak hour. It is concluded that design option 2 is the appropriate solution that is proportionate to the effects of the developments.

In recognition that TfL and LB Hounslow may in the future be keen on delivering wider improvements to pedestrian and cyclist movements, including east-west movements along the Great West Corridor, the Transport Assessment also contains plans identifying potential variations to options 3 and 4, with staggered crossings instead of straight crossings, that could be investigated in the future. This is reflected in the draft s106 heads of terms for Tesco Osterley with a proposed obligation relating to the investigation and assessment of staggered pedestrian crossing across the northern arm of the Great West Road junction (the variation to option 3) at a future date.

### **Noise and air quality**

The Environment Statement Addendum confirms that there would be no change to the conclusions on noise and air quality as a result of the updated traffic modelling.

The air quality methodology takes into account daily traffic flows and daily average traffic speeds. Whilst the additional peak hour traffic modelling identifies some temporary effects on traffic speeds, these are short term effects within the peak hour, which have no effect on the daily average traffic speeds.

Similarly, the noise methodology takes into account weekly traffic flows and weekly average traffic speeds. Whilst the additional peak hour traffic modelling identifies some temporary effects on traffic speeds, these are short term effects within the peak hour, which have no effect on the weekly average traffic speeds.

The incorporation of the flexibility to allow for alternative bus arrangements, including the potential for a route through the site, does not have any effects on the conclusions on the suitability of the site for residential use in both noise and air quality terms. Buses, servicing vehicles and local traffic passing through the proposed development would be significantly lower than the traffic volume flows assessed along Syon Lane, where the monitoring study and the modelling assessment has shown that predicted concentrations would be well below the objectives. The reroute of the buses across the site and the increase in servicing vehicles would therefore not result in a significant impact and would not materially change the site suitability conclusions as reported in the September 2020 ES.

### **Townscape and heritage**

During the course of the application, a number of comments have been received from stakeholders suggesting additional viewpoints to incorporate in the townscape assessment. An additional appendix has been included in the Environmental Statement Addendum which provides responses to these suggestions and explains the selection of the additional viewpoints.

Three additional viewpoints from Kew have been selected and the addendum to the townscape chapter provides an assessment of the effect of the proposed development on these views (including the cumulative effect with the Homebase Brentford development). The townscape assessment.

From outside Old Isleworth Gate, and from the Thames Path opposite Syon House, the townscape assessment identifies that the view of the majority of the development would be obscured by mature trees within Syon Park. A limited glimpsed view would be possible of the development in the far background of the view in the winter, resulting in a very low magnitude of impact on the both views. The effect of the completed development on both views is identified as being neutral in



nature. The townscape identifies a temporary adverse effect on both of these views during the construction phase, associated with the cranes during construction.

The third additional view is taken from the Woodland Walk within Kew. The townscape assessment identifies that the development would have no effect on this view.

On the basis of the additional townscape assessment, an addendum is provided to the Heritage Statement, which confirms that there is no change to the previous conclusion that the development would not cause any harm to the Kew World Heritage Site or to the listed Syon House.

The conclusions in the Heritage Statement remain valid – that the professional judgement of KM Heritage is that the proposed development would not cause any harm to heritage assets, but that if a subjective assessment of the visibility of the development leads

### **Residential quality**

The depth of development parcel of the houses on Macfarlane Lane (Block J) have been reduced ensure a minimum of 18m separation to properties in Oaklands Avenue and minimum rear garden depth of 5.6m. This allows for dual aspect to both MacFarlane lane and their private rear gardens. In addition to their private rear gardens, private amenity space may be provided in the form of upper level balconies or a roof terrace, but only fronting MacFarlane Lane to avoid overlooking of the gardens of existing houses. These homes will have a minimum of 40 sqm of private amenity space.

### **Trees**

The footprint of the central part of Block F at basement and ground floors has been set back to ensure that the building would be outside of the extended root protection area for the existing oak tree on Macfarlane Lane. The access to the basement cycle storage area has been relocated to minimise landscaping works within this area.

### **Phasing of affordable housing**

The draft heads of terms of the s106 have been amended to provide additional details on the phased delivery of affordable housing within the development. It is proposed that the s106 firstly requires the submission and agreement of an affordable housing phasing plan, and secondly that each phase of development (as identified on affordable housing phasing plan) includes a minimum of 25% affordable housing and a maximum of 45% affordable housing.

### **Conclusions**

We trust that this submission provides the Council with sufficient information to undertake a further consultation and to take the application forward for determination. We look forward to discussing with you over the coming weeks.

Yours sincerely

Simon Roberts  
Planning Director

XX/xx

Encl.

