OSTERLEY PLACE

TESCO, OSTERLEY SITE, TW7 5NZ

VOLUME 4: ENVIRONMENTAL STATEMENT ADDENDUM

Consultant: Ramboll UK Limited





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PREAMBLE

Background

An outline planning application (the 'application') was submitted by St Edwards Homes Limited (the 'Applicant') in September 2020 for the residential-led, mixed use redevelopment (the 'proposed development') of the Osterley Tesco site, Syon Lane, Isleworth, TW7 5NZ (the 'site') within the London Borough of Hounslow (LBH) under application reference P/2020/3100.

The application was accompanied by an Environmental Statement (the 'September 2020 ES') prepared by Ramboll UK Ltd ('Ramboll') and a team of technical specialists, which comprised the following documents:

- Non-Technical Summary (NTS);
- Volume 1: Environmental Statement Main Report;
- Volume 2: Townscape, Visual and Built Heritage Assessment; and
- Volume 3: Technical Appendices.

Since the submission of the application, post-submission consultation has been undertaken with the LBH and relevant statutory and non-statutory consultees. As a result of the consultation feedback, minor amendments have been made to the proposed development.

Accordingly, the parameter plans, development specification and design code have been updated and will be submitted. The proposed development as amended is hereafter referred to as the 'amended proposed development'.

In addition, discrete additional assessments have been requested in respect of transport, visual and built heritage.

Reasons for Submission

Updated environmental impact assessments have been undertaken to assess the potential impacts and likely effects of the amended proposed development as a whole, accounting for the proposed amendments to the proposed development. Furthermore, the discrete additional assessments have been undertaken.

The outcomes of these assessments are presented in this addendum document (the 'January 2021 ES Addendum'), which comprises Volume 4 of the ES.

ES Volume 4 comprises the following:

- ES Volume 1A: Environmental Statement Main Report Addendum;
- ES Volume 2A: Townscape, Visual and Built Heritage Heritage Assessment Addendum; and
- Volume 3A: Technical Appendices Addendum.

In addition, a Replacement Non-Technical Summary has been prepared.

The January 2021 ES addendum should be read alongside the September 2020 ES.

The January 2021 ES Addendum has been prepared in accordance with the statutory procedures set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. (the 'EIA Regulations').

ES Availability and Comments

CD versions of the full ES are available for purchase from Ramboll. Requests should be sent to the following address:

Ramboll UK Ltd

240 Blackfriars Road

London

SE1 8NW

Tel: 0207 808 1499

Copies of the application and full ES are also available for viewing by the public in the Planning Department of the LBH during normal office opening hours and on the LBH's online planning portal.

Comments on the application should be forwarded to LBH at:

London Borough of Hounslow

Hounslow House

7 Bath Road

Hounslow Middlesex

TW3 3EB

Tel: 020 8583 5555

Email: planningcomments@hounslow.gov.uk

¹ Secretary of State, 2017. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. London, HMSO.

ENVIRONMENTAL STATEMENT VOLUME 1A: ENVIRONMENTAL STATEMENT MAIN REPORT ADDENDUM

1A INTRODUCTION

Introduction

1A.1 The pre-submission background set out in the September 2020 ES remains valid for the amended proposed development. This document comprises ES Volume 1A.

Development Context

1A.2 The site location, the site context and the site description as set out in the September 2020 ES remain valid for the amended proposed development.

Planning Context

Planning Policy Context

- 1A.3 In respect of international, national and local legislation and policy, there have been no material changes of relevance to the updated environmental impact assessment since the September 2020 ES was completed.
- 1A.4 In respect of regional policy, it is noted that the Mayor of London formerly approved the Publication London Plan on 21 December 2020 and submitted it to the Secretary of State (SoS). Where the Publication London Plan introduces new matters for consideration within technical topics, these are addressed as appropriate in the January 201 ES Addendum.
- 1A.5 Additional relevant guidance updates are addressed as appropriate in the January 2021 ES Addendum.

Planning History

1A.6 The planning history as set out in the September 2020 ES remains valid for the amended proposed development, with the exception of the addition of the proposed development's planning application submission (P/2020/3100).

Proposed Development Summary

1A.7 The proposed development as described on the application form remains as stated in the September 2020 ES.

Applicant

1A.8 The Applicant as set out in the September 2020 ES remains valid for the amended proposed development.

Project Team

1A.9 The project team as set out in the September 2020 ES remains valid for the amended proposed development.

Environmental Statement

Environmental Statement Structure

- 1A.10 The content of the September 2020 ES remain valid.
- 1A.11 The full Environmental Statement (ES) comprises the following documents:
 - Replacement Non-Technical Summary (NTS);
 - September 2020 ES:
 - Volume 1: Environmental Statement Main Report;
 - Volume 2: Townscape, Visual and Built Heritage Assessment;
 - Volume 3: Technical Appendices; and
 - January 2021 ES Addendum:
 - Volume 4: Environmental Statement Addendum.
- 1A.12 The January 2021 ES Addendum comprises the following documents:
 - Volume 1A: Environmental Statement Main Report Addendum, comprising the following chapters:
 - Table of Contents
 - Preamble
 - Chapter 1A: Introduction
 - Chapter 2A: EIA Approach and Methodology
 - Chapter 3A: Alternatives and Design Evolution
 - Chapter 4A: Proposed Development Description
 - Chapter 7A: Transport and Accessibility
 - Chapter 8A: Air Quality
 - Chapter 9A: Noise and Vibration
 - Chapter 10A: Wind Microclimate
 - Chapter 12A: Cumulative Effects
 - Chapter 13A: Summary of Residual Effects
 - Glossary of Terms and Abbreviations
 - Volume 2A: Townscape, Visual and Built Heritage Assessment Addendum
 - Chapter 1A: Townscape and Visual
 - Appendix 1.7A: Post-Submission Consultation Comments
 - Appendix 1.8A: Response to Post-Submission Consultation Comments
 - Appendix 1.9A: Additional Views Visual Impact Assessment
 - Chapter 2A: Built Heritage
 - Appendix 2.2A: Additional Views Heritage Impact Assessment
 - Volume 3A: Technical Appendices Addendum
 - Appendix 7.1R: Replacement Transport Assessment
 - Appendix 7.3A: Replacement Transport Assessment (Gillette Corner Design Option 2)

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- Appendix 7.4A: Transport Assessment Addendum (Gillette Corner Design Option 3)

Environmental Statement Content

1A.13 The required content of the ES is set out in Regulation 18(3) and Schedule 4 of the EIA Regulations. Table 1.2 presents a summary of these requirements and indicates where in the September 2020 ES and the January 2021 ES the requirements have been met.

	the January 2021 ES the requirements have been met.					
Tab	Table 1.2: Information Required in an Environmental Statement (Schedule 4 of EIA Regulations)					
Req	uired Information	Chapter/Section of ES				
1	 A description of the development, including in particular: a description of the location of the proposed development; a description of the physical characteristics of the proposed development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational stages; a description of the main characteristics of the operational phase of the proposed 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; 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 stages. 	ES Chapter 1 and 1A: Introduction, Volume 1 and 4 ES Chapter 4 and 4A: Proposed Development Description, Volume 1 and 4 ES Chapter 5: Demolition and Construction Description Volume 1 ES Chapters 6-12 of Volume 1 and updates assessments of Volume 4 ES Chapters 1-2 of Volume 2 and 1A-2A of Volume 4				
2	A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the Applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	ES Chapter 3 and 3A: Alternatives and Design Evolution, Volume 1 and Volume 4				
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 proposed 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.	ES Chapter 3 and 3A: Alternatives and Design Evolution, Volume 1 and Volume 4				
4	A description of the factors specified in Regulation 4(2) likely to be significantly affected by the proposed 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, and the interaction between such factors.	ES Chapters 6-12 of Volume 1 and updates assessments of Volume 4 ES Chapters 1-2 of Volume 2 and 1A-2A of Volume 4 ES Technical Appendices, Volumes 3 and Volume 4				

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able 1.2: Information	Required in an	Environmental	Statement (Schedule 4 o	of EIA Regulations)
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Table 1.2: Information Required in an Environmental Statement (Schedule 4 of EIA Regulations)					
Required Information			Chapter/Section of ES		
5		ription of the likely significant effects of the proposed pment on the environment resulting from, inter alia:	ES Chapters 6-12 of Volume 1 and updates assessments of		
	a)	the construction and existence of the development, including, where relevant, demolition works;	Volume 4 ES Chapters 1-2 of Volume 2 and		
	b)	the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;	1A-2A of Volume 4 ES Technical Appendices, Volumes 3 and Volume 4		
	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; and			
	g)	the technologies and the substances used.			
	specific indirect mediur	scription of the likely significant effects on the factors ed in Regulation 4(2) should cover the direct effects and any t, secondary, cumulative, transboundary, short-term, n-term and long-term, permanent and temporary, positive gative effects of the development.			
	protect which a particu	scription should take into account the environmental ion objectives established at Union or Member State level are relevant to the proposed development, including in lar those established under Council Directive 92/43/EEC and we 2009/147/EC.			
5	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.		ES Chapters 6-12 of Volume 1 and updates assessments of Volume 4 ES Chapters 1-2 of Volume 2 and 1A-2A of Volume 4		
			ES Technical Appendices, Volumes 3 and Volume 4		

Table 1.2: Information Required in an Environmental Statement (Schedule 4 of EIA Regulations)						
Req	uired Information	Chapter/Section of ES				
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). The 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 stages.	ES Chapter 5: Demolition and Construction Description, Volume 1 Mitigation sections of ES Chapters 6-12 of Volume 1 and updates assessments of Volume 4 ES Chapters 1-2 of Volume 2 and 1A-2A of Volume 4 ES Technical Appendices, Volumes 3 and Volume 4				
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. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU(c) of the European Parliament and of the Council or Council Directive 2009/71/Euratom or UK environmental assessments may be used for this purpose provided that the requirements of this Directive are met. 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.	ES Chapters 6-12 of Volume 1 and updates assessments of Volume 4 ES Chapters 1-2 of Volume 2 and 1A-2A of Volume 4 ES Technical Appendices, Volumes 3 and Volume 4				
9	A non-technical summary of the information provided under paragraphs 1 to 8.	Replacement Non-Technical Summary				
10	A reference list detailing the sources used for the descriptions and assessments included in the ES.	ES Chapters 1-12 of Volume 1 and Volume 4 ES Chapters 1-2 of Volume 2 and 1A-2A of Volume 4 ES Technical Appendices, Volumes 3 and Volume 4				

Environmental Statement Good Practice

1A.63 Good practice in the preparation of an ES is defined in a number of sources, with more specific issues covered by ES review checklists. In terms of widely applicable and practical guidance, and consistent with the approach followed for the September 2020 ES, the IEMA Quality Mark indicator check has been referenced in producing this ES. Ramboll is a Registrant of the IEMA Quality Mark.

2A EIA PROCESS AND METHODOLOGY

Introduction

- 3A.1 The introduction as presented in the September 2020 ES remains valid for the amended proposed development.
- 3A.2 This chapter should be read alongside Chapter 2: EIA Process and Methodology of the September 2020 ES, Volume 1.

Environmental Impact Assessment

3A.3 The background to EIA as described in the September 2020 ES remains valid for the amended proposed development.

EIA Process

3A.4 The EIA process as described in the September 2020 ES remains valid for the amended proposed development.

Scope of EIA

- 3A.5 The scope of the EIA remains valid for the amended proposed development; however, updated assessments have not been undertaken in respect of the following technical topics as there would be no change to the conclusions of the September 2020 EIA:
 - Ground Contamination;
 - Ecology;
 - · Flood Risk;
 - Historic Environment (Archaeology);
 - Socio-Economics; and
 - Daylight, Sunlight and Overshadowing.

EIA Approach

- 3A.6 The approach to the EIA as set out in the September 2020 EIA, remains valid.
- 3A.7 The ES Addendum reports on the effects of minor amendments that have been made to the proposed development as assessed in the September 2020 ES.
- 3A.8 In addition, the ES Addendum reports on the outcomes of additional assessments requested by LBH and key stakeholders, including TfL. In respect of these assessments:
 - consideration has been given to impacts on Kew Gardens from three additional views;
 - consideration has been given to two Bus Route Options for the site; and
 - updated and additional traffic modelling has been undertaken in relation to journey time markers
 and to include the request for a new option for highway works to the Gillette Corner junction (A4
 Great West Road/Syon Lane) to be delivered as part of the Homebase development (but relied upon
 in the future baseline assessment for the proposed development). The TA (Technical Appendix 7.1,

ES Volume 3) previously modelled three junction options, but updated junction modelling now present results for:

- Option 1: No additional pedestrian/cyclist crossings;
- Option 2: New north-south pedestrian/cyclist crossing on the eastern side of the junction;
- Option 3: New pedestrian/cyclist crossings on the northern, eastern and southern sides of the junction;
- New Option 4: New north-south pedestrian crossing on the eastern side of the junction on the
 eastern side of the junction, and a new east-west crossing on the southern side of the junction
 (to replace the existing staggered crossing by the existing access to the Homebase site).

3A.9 It is noted that:

- the September 2020 Transport and Accessibility assessment based the bus and driver delay assessment on Option 1. The assessment has now been updated to present the updated AM, PM and Saturday Peak flow results for Option 4 as the reasonable worst-case (with Options 2 and 3 covered in Appendix 7.3A and 7.4A respectively for completeness); and
- all other effects presented in the September 2020 Transport and Accessibility assessment are unaffected as these have been assessed based on daily flows which would remain unchanged.
- 3A.10 The EIA specialists who completed the September 2020 ES have reviewed the amended proposed development and its potential to generate any materially new or different environmental effects or changes to the conclusions drawn in the September 2020 ES.
- 3A.11 The ES Addendum builds on the analysis and assessments presented in the September 2020 ES to provide information necessary to assess the likely significant environmental effects of the amended proposed development. Large sections of the September 2020 ES remain valid and hence the following chapters of ES Volume 1 do not require updating or replacement:
 - Chapter 5: Demolition and Construction .Management;
 - Chapter 6: Socio-Economics; and
 - Chapter 11: Daylight, Sunlight and Overshadowing.
- 3A.12 In respect of ES Volume 3, all of the technical appendices remain valid with the exception of the Transport Assessment which has been fully updated (Appendices 7.1R and supporting Appendices 7.3A and 7.4A).
- 3A.13 These documents remain valid because following review of the proposed amendments, the amended proposed development, baseline conditions, policy and assessment guidance, it has been concluded by specialists that the September 2020 assessment conclusions remain valid and do not require update.
- 3A.14 The following approach has been followed for addendum chapters:
 - For Chapters 1-3 of ES Volume 1, short updated summary addendum chapters have been prepared;
 - For Chapter 4 of ES Volume 1, a track changed, updated chapter has been prepared;
 - For Chapter 7 of ES Volume 1, a track changed, updated chapter has been prepared;
 - For Chapters 8-10 (air quality, noise and vibration; wind) of ES Volume 1 and Chapters 1-2 (townscape and visual) of ES Volume 2, short updated summary addendum chapters have been prepared to report on the conclusions of the updated assessments;
 - For Chapters 12 and 13 of ES Volume 1, track changed, updated chapters have been prepared;
 - For the Transport Assessment in ES Volume 3, a Replacement document has been prepared; and

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- For the NTS, a track changed, fully updated report has been prepared.
- 3A.15 In respect of inter-project effects, no additional or amended cumulative schemes have been identified for consideration in this updated assessment. Accordingly, Table 2.2 and Figure 2.1 remain valid.

Technical Assessment Chapters

- 3A.16 The structure of technical assessment chapters remain unchanged. The structure of the January 2021 ES Addendum is consistent with the structure of the September 2020 ES.
- 3A.17 For Chapters 4, 7, 12 and 13 (proposed development description, transport and accessibility; cumulative effects; and residual effects) of ES Volume 1, track changed updates have been made. To aid the reader in understanding what text, figures and tables of the September 2020 ES have been amended and/or replaced, where amendments to an original ES Chapter have been considered necessary as a result of the proposed amendments and additional assessments requested, these have been highlighted in the text as follows:
 - Deleted text is shown as strikethrough red text (e.g. proposed development);
 - Replacement or new text is shown as underlined blue text (e.g. proposed development);
 - All paragraphs where text has been amended within a paragraph, the whole paragraph has been reproduced showing the relevant correction. Such amended paragraphs are labelled with the addition of the letter A, i.e. 7.75A;
 - Where the content of a table has changed, but it is considered useful to show a direct comparison with the original text, the Table title is identified by the addition of the letter A, i.e. Table 2.1A;
 - Where a paragraph, figure image or table has been replaced in full, the new paragraph, Figure or Table title is identified by the addition of the letter R, i.e. Table 2.1R;
 - Where additional paragraphs are inserted, they are indicated by the inclusion of a letter N, with consecutive numbers N1, N2, N3 etc. after the preceding paragraph number, i.e. 8.87N1. This avoids having to change all subsequent paragraph numbers;
 - Where it has been necessary to amend or replace or add Technical Appendices, the amended or replacement Technical Appendix is renumbered by the addition of the letter \underline{A} or \underline{R} respectively, i.e. Technical Appendix 7.1 \underline{R} ; and
 - Where the level of amendments to a technical assessment chapter are extensive and using the track
 changed format described above could be confusing, the whole ES chapter is replaced and shown in
 blue underlined text (without any deleted chapter text shown).

Volume 1A: Environmental Statement Main Report Addendum
Chapter 2A: EIA Approach and Methodology

3A ALTERNATIVES AND DESIGN EVOLUTION

Introduction

- 3A.18 This chapter of the January 2021 ES Addendum reports on the design evolution process undertaken by the Applicant following submission of the application. The chapter outlines the main reasons for the proposed amendments. The predominant consideration has been comments provided by the LBH and key consultees on the proposed development as submitted in September 2020.
- 3A.19 This chapter should be read alongside Chapter 3: Alternatives and Design Evolution of the September 2020 ES, Volume 1.

Development Objectives and Considerations

- 3A.20 The proposed development objectives and considerations set out in the September 2020 ES remains valid for the amended proposed development.
- 3A.21 The opportunities and environmental considerations set out in the September 2020 ES remain valid for the amended proposed development.

Alternatives

3A.22 The 'Do Nothing' scenario set out in the September 2020 ES remains valid for the amended proposed development.

Post-Submission Alternative Design

- 3A.23 Since submission of the September 2020 ES Application, a number of design amendments have been made in response to ongoing consultation feedback from the LBH and key stakeholders.
- 3A.24 The proposed amendments comprise the following:
 - Revision of the 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;
 - Reduction of the depth of Block J to ensure a minimum of 18 m separation to properties in Oaklands Avenue and a minimum rear garden depth of 5.6 m;
 - Replacement of the 3 m shared pedestrian/cycle route along the frontage of the site with Syon Lane with a 4 m segregated cycle/pedestrian route to improve accessibility;
 - Introduction of 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 proposed in September 2020 (Bus Route Option 1) or at an alternative location within the site (Bus Route Option 2), with the final location to be agreed as part of the reserved matters details;
 - Bus Route Option 1: Buses would enter the site via Grant Way, enter the bus turn facility
 adjacent to the mobility hub on the site's eastern boundary and exit again via Grant Way. Bus
 stop and bus stand facilities would be provided on the northbound carriage of Grant Way and
 within the bus turn; or
 - Bus Route Option 2: Buses would enter the site via Syon Lane and the spine road, stop at a layover facility alongside Block G, travel clockwise along the east-west northern lane and exit via Grant Way.

For both options there would be nine buses per hour (three for service H28 and six for service E1). Passengers for both services would board and alight on-site and E1 buses would layover on-site, with the site acting at the terminus to this route. For Bus Route Option 2, there would be a 50 % reduction of public bus movements in Grant Way compared with Bus Route Option 1.

Buses would be stopped for approximately five to six minutes at the proposed layover facilities. No idling busses are anticipated.

- Introduction of flexibility for the location of the single storey mobility hub (previously referred to as Block K) to match Bus Route Options 1 or 2 with no change to nature or scale of this building;
- Amendment of the Access and Movement Parameter Plan to:
 - remove the specific zone for bus pick up and turning;
 - remove the specific zone for bus alighting and resting;
 - include a new zone for bus access and single storey mobility hub (allowing either access configuration and the associated relocation of the mobility hub); and
 - amend the loading, parking and landscaping zone within the northern lane to allow either option.
- Amendment of the Proposed Open Space at Ground Floor Parameter Plan to reflect the ability to incorporate a single storey mobility hub within the public space;
- Preparation of a parameter plan to fix minimum separation distances previously presented in the Design Code as requested by LBH;
- Amendment of all other parameter plans to remove the specific footprint of Block K and provide the two option locations;
- Amendment of the Design Code to remove the mandatory elements relating to the bus arrangement and reflect the potential for either option to be delivered;
- Set back of the basement and ground floor of Block F out of the root protection area of the existing oak tree on Macfarlane Lane;
- Commitment to deliver minimum floorspace amounts for groupings of uses within the non-residential floorspace to ensure the final development delivers a mix of uses (with no change to overall minimum and maximum extents of non-residential floorspace used in assessments); and
- Widened of the housing mix ranges for intermediate homes to allow for the potential of no studio homes and some 3-bed homes within this tenure and 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 (with no change to the housing mix used for assessments).

Consultation

- 3A.25 The pre-application consultation set out in the September 2020 ES remains valid for the amended proposed development.
- 3A.26 Following submission of the September 2020 Application, the Applicant undertook specific postsubmission consultations via email with planning officers at the LBH and TfL.

Selected Option

3A.27 The amended proposed development has sought to respond to the LBH and key stakeholder comments. The proposed amendments deliver alternative options for incorporation of a bus route through the site, minor amendments to Blocks J and F, an amended Energy Strategy to utilise more sustainable methods

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of heating and ventilation, as well as commitments to the non-residential floorspace and unit and minor changes to the housing mix.

Summary

3A.28 The summary as presented within the September 2020 ES remains valid.