

**BARTON WILLMORE RESPONSE TO LBH EIA SCOPING REVIEW**

## MEMORANDUM

**File Ref: 30220**

**Date: 20<sup>th</sup> September 2019**

**To: Shane Baker, Kiri Shuttleworth**

**From: Neil Purvis**

**Subject: Homebase, Syon Lane (ref: 18/00001/SCOP)**

Thank you for the draft EIA Scoping Opinion provided on 13<sup>th</sup> September (ref: 00505/H/SCOPE1) for the proposed development at Homebase, Syon Lane in Brentford. It is noted that the draft Opinion accords with the majority of the Scoping Report submitted by the Applicant. There are a few technical areas that we wish to clarify and request that the formal Scoping Opinion takes the following into consideration.

### **Development Description**

The development proposal described on page 1 of the draft Scoping Opinion is for:

*"Demolition of the existing buildings, and the construction of a residential led mixed-use development comprising multi-storey buildings, the tallest buildings up to a maximum height of 16 storeys (71m AOD) providing up to 520 residential units, up to 8,500 sqm (gross internal area) of commercial floorspace (Tesco Extra) and flexible commercial use, with car parking"*

To clarify, the proposed development will be up to 16 storeys (75m AOD (excluding plant)), providing up to 500 residential units and up to 10,700 sqm GIA of commercial retail floorspace. The retail floorspace will comprise the Tesco store of up to 10,500sqm GIA and a further 200sqm GIA on Syon Lane of proposed retail use.

The above changes will not alter the proposed scope of the ES and topics we had suggested to be scoped in or out of the ES.

### **3.0 Environmental Topics**

#### **Population and Human Health**

Paragraph 3.3 of the draft Scoping Opinion states that 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). We acknowledge that an HIA should be submitted as part of the planning application. It is proposed that this will follow the Healthy Urban Development Unit (HUDU) rapid HIA methodology and include relevant information from the ES and other reports submitted in support of the planning application that have a bearing on human health. The HIA will be included as an appendix to the Population and Human Health ES chapter.

### **Built Heritage**

No comments have been received from Historic England on the EIA Scoping Report and we would request that they are consulted as part of the Scoping process before LBH adopts its formal Scoping Opinion to satisfy Regulation 15(4) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

### **Townscape and Visual Effects**

Paragraphs 3.9 and 3.10 raise points on the methodology used to produce visual representations. These comments will be picked up within the final verified views and the supporting methodology for the AVR assessment.

Please note that the Landscape Institute has now issued their technical guidance for preparing Visual Representations of Development Proposals (TGN 06/19), see link: <https://www.landscapeinstitute.org/visualisation/>. This guidance will be followed in the preparation of the visual representations as it supersedes Photography and Photomontage in Landscape and Visual Impact Assessment – TGN Draft 2018-06-01.

One additional viewpoint has also been requested for review (Paragraph 3.11) to determine if further assessment is needed as follows:

- Deer Park close the Kew Observatory (view towards the Site)

Appendix 1 sets out a this review of this viewpoint. In summary, it is not considered that an additional view is required from this location as the area is not publicly accessible and contains a number of mature and semi-mature trees, which would screen views. Test imagery which has been undertaken from representative views 17 and 18 also illustrates that the proposed development will not be visible in these locations, which sit either side of the additional view location requested.

### **Transport and Access**

Within the Transport and Access Scoping section, points have been raised on the traffic survey methodology and modelling work.

#### *Traffic Survey Methodology*

In response to paragraph 3.4, carpark beat surveys have been undertaken at 15 minute intervals to identify “Park and Stride” movements associated with the operation of the Nishkam School, utilising the Osterley Tesco carpark. In relation to the Nishkam School application, it was agreed as part of the s106 agreement, that the carpark of the Wyevale Garden Centre situated approximately 480 metres to the north of the school on Windmill Lane, could be used to accommodate Park and Stride trips.

The survey data will be utilised to assess the points raised within paragraph 3.15.

Please note that the scope of the traffic survey locations and methodology has been agreed with LBH and TfL.

## *Strategic Modelling*

Paragraph 3.21 states that full, multi-modal strategic modelling of the proposals is required to enable a full understanding of the proposals' strategic impact on the transport network; including vehicular traffic, public transport, walking and cycling. It has been agreed with TfL however that undertaking strategic modelling is not required, but instead to undertake intermediate modelling. It is agreed that the proposed development will lead to some reassignment of traffic at Gillette Corner and on local roads but would not lead to any overall uplift in traffic on any road links that would lead to a strategic impact on the transport network.

It has been agreed with TfL and the project transport consultants that TfL's strategic models would be consulted in order to obtain:

- 1 Traffic distribution data to support the assignment of residential traffic. It is presumed that data would be taken from a zone that is local to the site and that the VISSIM models are prepared so that the associated traffic distribution matches that zone. TfL are to provide a distribution using demand from either their LTS or HAM models.
- 2 Data to guide the assessment of background traffic growth on the A4 and Syon Lane. This would be in the form of traffic flow plots obtained from TfL, separately for the base year (2012) and the forecast year.

## **Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare**

Paragraph 3.36 states that *"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."*

It is expected that the vast majority of the surrounding residential buildings will retain a VSC above 20%, however there may be a few locations where the figures drop below these levels. Whilst it is recognised that the area surrounding the site can be described as 'suburban', the proposals are not to build a suburban density development. The daylight levels retained to the surrounding buildings must therefore reflect this.

Based on the above, it is proposed that the primarily alternative target for the site is 20% VSC. However, it is also recognised that it is a site where some lower levels of daylight (typically between 15% to 20% VSC) can also be considered acceptable, which reflects the change in density that will occur in the area.

## **Cumulative Effects**

We note the request from Paragraph 3.39 for the inclusion of additional cumulative schemes within the ES, including the Former Syon Gate Service Station, 891 Great West Road, New Horizons Court and Sky Sites 6 & 7. These schemes will be included as part of the cumulative assessment within the ES.

In addition to the above points, we acknowledge and will seek to address within the ES, all the Scoping comments received on the environmental topics scoped in and out of the ES as well as the consultee comments detailed within Appendix 1 of the draft Scoping Opinion.